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U.S. ARMY ENVIRONMENTAL CENTER

**FORT HOLABIRD
DEFENSE INVESTIGATIVE SERVICE (DIS)**

**BASE REALIGNMENT AND CLOSURE
(BRAC) CLEANUP PLAN**

VERSION II

Final Document

December 1998

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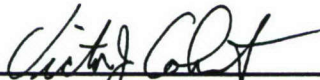
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**FORT HOLABIRD DIS
BASE REALIGNMENT AND CLOSURE (BRAC) CLEANUP PLAN
VERSION II**

FINAL DOCUMENT



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December 1998

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LIST OF ACRONYMS AND ABBREVIATIONS

AC	Air Conditioning
ACM	Asbestos-containing material
ADT	Average Daily Trip
AJCC	Alternate Joint Communications Center
AR	Army Regulation
ARAR	Applicable or Relevant and Appropriate Requirement
AREE	Area Requiring Environmental Evaluation
AST	Above-ground Storage Tank
BCP	BRAC Closure Plan
BCT	BRAC Cleanup Team
BDC	Baltimore Development Corporation
BEC	BRAC Environmental Coordinator
BMP	Best Management Practices
BTEX	Benzene, Toluene, Ethyl benzene, Xylenes
Bldg	Building
BRAC	Base Realignment and Closure
CCl ₃ F	Trichlorofluoromethane
CEMML	Center for Ecological Management of Military Lands
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
CFR	Code of Federal Regulations
CMS	Corrective Measures Study
CRC	Crime Records Center
CRP	Community Relations Plan
CWA	Clean Water Act
DD	Decision Document
DEH	Directorate of Engineering and Housing
DIS	Defense Investigative Service
DoD	Department of Defense
DOT	Department of Transportation
DPW	Department of Public Works
DQO	Data Quality Objectives
DRMO	Defense Reutilization and Marketing Office
EA	Environmental Assessment
EBS	Environmental Baseline Survey
ECAS	Environmental Compliance Assessment System
EDC	Economic Development Conveyance
EIS	Environmental Impact Statement
EMD	Environmental Management Division
EMO	Environmental Management Office
ES	Environmental Sampling
FFA	Federal Facility Agreement
FFS	Focused Feasibility Study
FLAB	Floristics Laboratory
FOST	Finding of Suitability to Transfer
FRP	Fiberglass reinforced plastic
FS	Feasibility Study
ft	foot/feet
ft ²	square feet
FTE	Full Time Equivalent
FY	Fiscal Year
gpm	gallons per minute
HCFC	Hydrochlorofluorocarbon

HIR	High-Intensity Reuse
IPR	In Process Review
IRA	Interim Remedial Action
IRDMIS	Installation Restoration Data Management Information System
IRP	Installation Restoration Program
ISA	Initial Screening of Alternatives
ISEC-CONUS ..	Information Systems Engineering Command - Continental United States
LBP	Lead-based Paint
lbs.....	pounds
LIR.....	Low-Intensity Reuse
LOS.....	Level of Service
LRA	Local Redevelopment Authority
LTM.....	Long-Term Monitoring
MBTU	Mega British Thermal Unit
MDE	Maryland Department of the Environment
MIR.....	Medium-Intensity Reuse
MITC	Military Intelligence Training Center
MSA	Material Storage Area
msl	mean sea level
MSW	Municipal Solid Waste
NA	Not Available
N/A	Not Applicable
NFA	No Further Action
NCO	Non-commissioned officer
NCP.....	National Oil and Hazardous Substance Pollution Contingency Plan
NEPA	National Environmental Policy Act
NFA	No Further Action
NFRAP	No Further Response Action Planned
NMCC	National Military Command Center
NOI.....	Notice of Intent
NPDES.....	National Pollutant Discharge Elimination System
NRC	Nuclear Regulatory Commission
O&M.....	Operations and Maintenance
OSHA.....	Occupational Safety and Health Administration
OU.....	Operable Unit
PA	Preliminary Assessment
PAH.....	Polycyclic Aromatic Hydrocarbon
PCB.....	Polychlorinated Biphenyl
PP	Proposed Plan
PUCA	Property Underlying Cummins Apartment
PWP.....	Project Work Plan
PX	Post Exchange
RA	Remedial Action
RAB.....	Restoration Advisory Board
RBC.....	Risk Based Concentration
RCRA.....	Resource Conservation and Recovery Act
RD	Remedial Design
RFI	RCRA Facility Investigation
RI.....	Remedial Investigation
ROD	Record of Decision
SAP	Sampling and Analysis Plan
SAR.....	Sampling and Analysis Recommendation
SARA	Superfund Amendments and Reauthorization Act
SVOC	Semi-Volatile Organic Compound
SWMU.....	Solid Waste Management Unit
TAL	Target Analyte List

TBA	To Be Arranged
TBD	To Be Determined
TPH-DRO	Total Petroleum Hydrocarbon - Diesel Range Organics
TPH-GRO	Total Petroleum Hydrocarbon - Gasoline Range Organics
TRC	Technical Review Committee
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage, and Disposal Facility
U.S.	United States
USACE	U.S. Army Corps of Engineers
USACHPPM	U.S. Army Center for Health Promotion and Preventative Medicine
USAEC	U.S. Army Environmental Center
USAEHA	U.S. Army Environmental Hygiene Agency
USAISC	U.S. Army Information Systems Command
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
USSCS	U.S. Soil Conservation Service
UST	Underground Storage Tank
UXO	Unexploded Ordnance
VOC	Volatile Organic Compound
WWII	World War II

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1.0 INTRODUCTION AND SUMMARY

Fort Holabird Defense Investigative Service (DIS) was a United States (U.S.) Army organization formerly located on 7.92 acres in the Fort Holabird Industrial Park within the corporate limits of Baltimore City, Maryland (MD). Fort Holabird DIS performed clearances for the Department of Defense (DoD) and other government entities. Fort Holabird DIS was approved for closure under the Base Realignment and Closure Act of 1995 (BRAC 95). Figure 1-1 shows the general location of the site. Fort Holabird DIS relocated operations to a new site in Linthicum, MD in July 1996. The official closure date for Fort Holabird DIS was October 1, 1998.

The purpose of this BRAC Cleanup Plan (BCP) is to: 1) summarize the current status of the Fort Holabird DIS environmental restoration and associated environmental compliance programs; 2) present the status of the Fort Holabird DIS disposal and reuse plan; and 3) present a comprehensive strategy for implementing response actions in support of installation closure, necessary to protect human health and the environment. The strategy integrates activities performed under both the environmental restoration program and the associated environmental compliance programs to support full restoration of the facility (DoD, 1993a,b, 1994). The BCP is a dynamic document designed to be updated regularly to incorporate newly obtained information and to reflect the completion or change in status of any remedial actions (RAs). This Version II BCP for Fort Holabird DIS was prepared with information available as of December 10, 1998.

The BCP is a planning document. Information, schedules, and RAs presented in this BCP do not necessarily reflect those that have been or will be approved by the U.S. Army or Federal and State regulatory agencies. It was necessary to make certain assumptions and interpretations to develop this document. As additional information becomes available, implementation programs and cost estimates could be dramatically altered.

1.1 BCP ORGANIZATION

The BCP is organized into seven sections:

- Section 1 – Introduction and Summary: describes the objectives of the environmental restoration program, explains the purpose of the BCP, introduces the Project Team formed to manage the program, and provides a brief history of the installation.
- Section 2 – Property Disposal and Reuse Plan: summarizes the current status of the Fort Holabird DIS property disposal planning process and describes the relationship of the disposal process with other environmental programs.
- Section 3 – Installation-Wide Environmental Program Status: summarizes the current status and past history of the Fort Holabird DIS environmental restoration program, associated environmental compliance programs, community relations activities, and the environmental condition of the installation.
- Section 4 – Installation-Wide Strategy for Environmental Restoration: describes the installation-wide strategy for environmental restoration, including the strategies for dealing with each area requiring environmental evaluation (AREE) on the installation. This chapter also includes plans for managing underground tanks via the underground storage tank (UST) program, and summarizes plans for managing responses under other compliance programs.
- Section 5 – Environmental Program Master Schedules: provides master schedules of planned and anticipated activities to be performed throughout the duration of the environmental restoration program, and summarizes plans for managing responses under other compliance programs.
- Section 6 – Technical and Other Issues to be Resolved: describes specific technical and/or other issues to be resolved and presents a strategy for resolving these issues.
- Section 7 – References: provides a list of the references utilized in the preparation of the BCP.

In addition to the main text, the following appendices are included in this document:

- Appendix A – Fiscal Year Funding Requirements/Costs: Tables presenting projected funding requirements, as well as a summary table of past costs for the environmental restoration program;
- Appendix B – Installation Environmental Restoration Documents Summary Tables: Listing of previous environmental restoration program deliverables by program and by site, as well as technical documents and data loading summaries;
- Appendix C – Decision Documents/Record of Decision (ROD) Summaries: Summaries of decision documents (DDs) for which an RA was selected;
- Appendix D – NFRAP Summaries: Summaries of each DD for each AREE for which a no further response action planned (NFRAP) decision has been made;
- Appendix E – Conceptual Model Data: Working conceptual models for AREEs; and
- Appendix F – Ancillary BCP Materials: Other ancillary materials relevant to the BCP.

1.2 ENVIRONMENTAL RESPONSE OBJECTIVES

The objectives of the base closure environmental restoration program at Fort Holabird DIS are as follows:

- Protect human health and the environment;
- Strive to meet reuse goals established by the U.S. Army and the community;
- Comply with existing statutes and regulations;
- Conduct all environmental restoration activities in a manner consistent with Section 120 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA);
- Meet Federal Facility Agreement (FFA) deadlines as detailed in Chapter 5 of this BCP;
- Conduct an Environmental Baseline Survey (EBS) and prepare a Community Environmental Response Facilitation Act (CERFA) Letter Report;
- Continue efforts to identify all potentially contaminated areas;
- Incorporate any new sites into the FFA as appropriate;
- Establish priorities for environmental restoration and restoration-related compliance activities (so that property disposal and reuse goals can be met);
- Initiate selected removal actions to control, eliminate, or reduce the risks to manageable levels;
- Identify and map the environmental condition of the installation, concurrent with remedial investigation (RI) efforts; consider future land use when characterizing risks associated with releases of hazardous substances, pollutants, contaminants, or hazardous wastes;
- Identify and map areas suitable for transfer by deed and areas unsuitable for transfer by deed;
- Complete investigations as soon as practicable for each AREE in an order of priority which takes into account both environmental concerns and redevelopment plans;
- Develop, screen, and select RAs that reduce risks in a manner consistent with statutory requirements;
- Commence RAs for (1) environmental and (2) property disposal and reuse priority areas as soon as practicable;

- Advise the real estate arm of the U.S. Army Corps of Engineers (USACE) of properties that are deemed suitable for transfer and properties that are not suitable for transfer because they are either not properly evaluated or pose an unacceptable human health or environmental risk;
- Conduct long-term RAs for groundwater and any necessary 5-year reviews for wastes left on site; and
- Establish interim and long-term monitoring (LTM) plans for RAs as appropriate.

1.3 BCP PURPOSE, UPDATES, AND DISTRIBUTION

This BCP presents, in summary fashion, the status of Fort Holabird DIS's environmental restoration and compliance programs and the comprehensive strategy for environmental restoration and restoration-related compliance activities. It lays out the response action approach at the installation in support of installation closure. In addition, it defines the status of efforts to resolve technical issues so that continued progress and implementation of scheduled activities can occur. The Fort Holabird DIS BCP Strategy and Schedule herein are designed to streamline and expedite the necessary response actions associated with the properties within Fort Holabird DIS in order to facilitate the earliest possible disposal and reuse of the property. Risk assessment protocols will incorporate future land use in exposure scenarios.

This BCP has been updated periodically since the draft version I document which was issued in March 1996. Future updates of the BCP will be conducted as necessary and distributed to each member of the Fort Holabird DIS BRAC Project Team and to additional individuals identified in Table 1-1.

Table 1-1. Fort Holabird DIS BCP Distribution List

Name	Title	Address
Sara Gracey	BRAC Environmental Coordinator (BEC)	Fort George G. Meade Directorate of Public Works ATTN: ANME-PWE Fort Meade, MD 20755-5115
Nikolas DiNardo	Project Manager	U.S. Environmental Protection Agency USEPA (3HS50) 1650 Arch Street Philadelphia, PA 19107-2029
Kim Lemaster	Project Manager	Maryland Department of the Environment (MDE) 2500 Broening Highway Baltimore, MD 21224
Glen S. Boldt	Restoration Oversight Manager	U.S. Army Environmental Center USAEC (SFIM-AEC-ERO) Building E4480, Edgewood Area Aberdeen Proving Ground, MD 21010
Major Brian Plaisted	Project Manager	U.S. Army Corps of Engineers (USACE), Baltimore District ATTN: CEMAB-PP-E PO Box 1715 Baltimore, MD 21203-1715
Charlotte Rodriguez	BRAC Program Coordinator	U.S. Military District of Washington Fort Leslie J. McNair ATTN: ANEN-ES, Building 42 Washington, D.C. 20319-5050

1.4 BRAC CLEANUP TEAM/PROJECT TEAM

The Fort Holabird DIS BRAC Cleanup Team (BCT) is comprised of three members: the BRAC Environmental Coordinator (BEC), a representative from the U.S. Environmental Protection Agency (USEPA) Region III, and a representative from the Maryland Department of the Environment (MDE). The BCT is led by the BEC. The BCT is responsible for the management of the BCP process and the preparation of this BCP. Additionally, the BCT members will serve as the decision makers for the efforts of the Project Team.

The Project Team consists of the BCT and additional individuals whom the BCT selects to assist in the environmental restoration process at Fort Holabird DIS. The Project Team is also led by the BEC. Project Team meetings are the means of conducting periodic program reviews and reaching consensus on decisions with Federal and State regulators. The BCT members and their roles regarding this project are presented in Table 1-2.

Table 1-2. Current BCT and Project Team Members

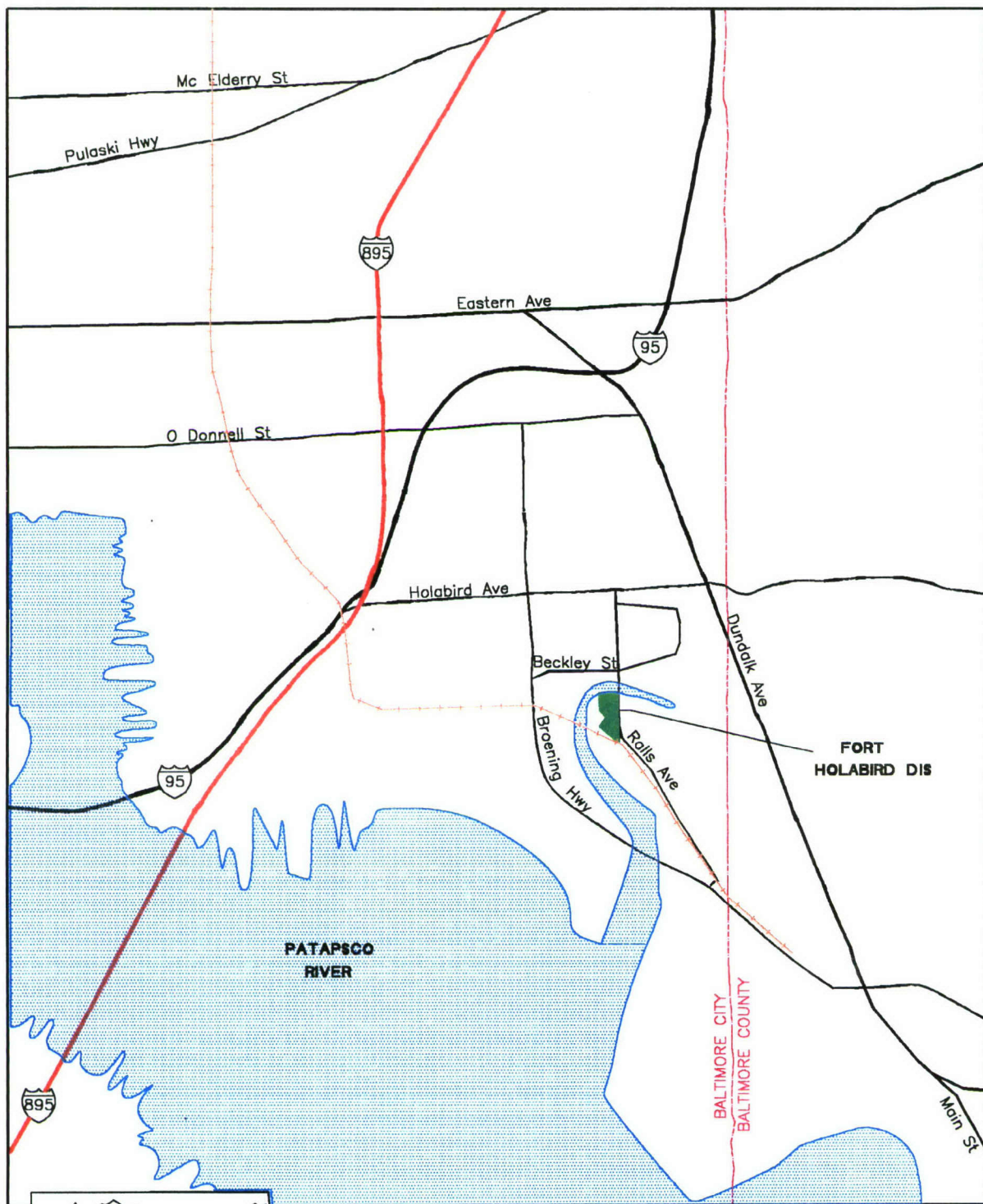
Name	Title	Organization	Phone	Role/Responsibility
Sara Gracey	BRAC Environmental Coordinator (BEC)	ANME-PWE	(301) 677 9854	Project Management and Oversight
Nikolas DiNardo	Project Manager	USEPA, Region III	(215) 566 3203	Project Oversight
Kim Lemaster	Project Manager	MDE	(410) 631 3440	Project Oversight
OTHER KEY PARTICIPANTS				
Major Brian Plaisted	Project Manager	USACE	(410) 962 6802	Contract Management and Oversight
Glen S. Boldt	Restoration Oversight Manager	USAEC	(410) 671 1611	Restoration Oversight/ Provide Army Policy Guidance
CONTRACTORS				
Timothy Longe	Project Manager	ICF Kaiser Engineers	(410) 612 6368 Fax: (410) 612 6351	Technical Support (EBS and BCP)

1.5 INSTALLATION DESCRIPTION AND HISTORY

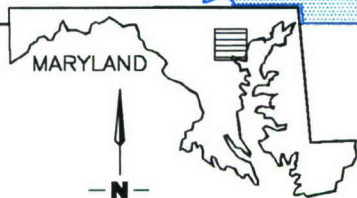
This section presents a general description of the Fort Holabird DIS property and its surrounding area. The location and history of the installation are presented along with a description of the activities which operated on the facility.

1.5.1 General Property Description

The Fort Holabird DIS property is located within the corporate limits of Baltimore City, Maryland, at 2200 Van Deman Street. The property occupies 7.92 acres in the Holabird Industrial Park in the Dundalk area, approximately one-half mile northeast of the Patapsco River. The site was originally a marshland, which was filled in around the time the larger Fort Holabird installation was created during World War I. The Fort Holabird DIS performed security clearances for the DoD and other federal government entities. The Fort Holabird DIS operations were relocated to Linthicum, MD in July 1996. Figure 1-1 shows the general location of the installation.



SOURCE: USGS TOPOGRAPHIC MAP



0 1
SCALE MILE

DEPARTMENT OF THE ARMY			
U.S. Army Environmental Center			
CONTRACT NO. DACA31-94-D-0064		2113 Emmerton Park Road Edgewood, Maryland 21040 (410) 612-8350	
ICP KAISER ENGINEERS			
PREPARED	I.B. DEE	TASK NO.	66226
CHECKED	RRC	ICF DWS NO.	
DATE	04-28-98	FHLOC1-1	
		FIGURE 1-1 FORT HOLABIRD DIS GENERAL LOCATION OF FORT HOLABIRD DEFENSE INVESTIGATIVE SERVICE.	



1.5.2 History of Installation

Fort Holabird was established in 1917 when 96 acres of land were allocated for a quartermaster mechanical repair unit. In 1941, additional land was acquired, and the installation grew to approximately 349 acres and 286 buildings during World War II (WWII). After WWII, portions of Fort Holabird were reassigned or sold off piece by piece. In 1970 the Defense Department announced plans to close Fort Holabird, relocating the Army's Intelligence operations to Fort Huachuca in Arizona. Thereafter, the largest transaction occurred during the period of 1977 to 1979, when 223 acres were sold to the City of Baltimore to form the Holabird Industrial Park and a recreational park.

During the history of the installation, several branches of the Army had operations at Fort Holabird (ERM, 1994, Weston, 1992)). A property acquisition and conveyance summary is provided in Table 1-3. No additional information regarding the nature of past U.S. Government activities was available from the review of title documents.

Table 1-3. Property Acquisition and Conveyance Summary

Tract Number	Index No.	Previous Land Owner	Acreage	Type of Acquisition	Date
		Original Reservation Area	152.55	Original	12/18/17
A-1	1	Carl W. Wellings et ux	0.04	Vendor Fee	5/3/41
A-2	2	ADA C. Moses et al.	0.15	Vendor Fee	5/3/41
A-3	4	T. Bayard Williams Sr. et ux	0.37	Vendor Fee	5/3/41
A-3-1	3	T. Bayard Williams et al	0.61	Vendor Fee	9/13/41
A-4	5	August Gorray et al	0.19	Vendor Fee	5/3/41
A-5	6	T. Bayard Williams Jr. et al	0.23	Vendor Fee	5/3/41
A-5-1	7	T. Bayard Williams Jr. et al	0.10	Vendor Fee	9/13/41
A-6	8	James Pritchard et ux	0.21	Vendor Fee	5/3/41
A-7	10	William J. Byrd et al	0.21	Vendor Fee	5/3/41
A-8	11	James W. West	0.21	Vendor Fee	5/3/41
A-9	12	Leonard T. Cross et ux	0.21	Vendor Fee	5/3/41
A-10	13	Teresa Parr et al	0.32	Vendor Fee	5/3/41
A-11(1)	14	John E. Michael et ux	0.21	Vendor Fee	5/3/41
A-11(2)	15	John P. Michael et al	0.21	Vendor Fee	8/22/41
A-12	16	C. Raymond Levis	0.43	Vendor Fee	5/3/41
A-13	9	Walter Sommers et al	2.69	Vendor Fee	9/13/41
A-14	17	Frederick Ghell et al	0.19	Vendor Fee	9/13/41
A-15	18	Edith T. Stengel et al	0.57	Vendor Fee	9/13/41
A-16	21	B.&O.R.R.Co. (Real Estate Imp. Co.)	8.25	Vendor Fee	9/13/41
A-17	23	Patapsco Building & Loan Assn.Inc.	0.41	Vendor Fee	9/13/41
A-18	24	Charles R. Warren et al	0.67	Vendor Fee	9/13/41
A-19	25	T. Bayard Williams (Trustee)	1.00	Vendor Fee	9/13/41
A-20	26	Mabel I. Paul	1.00	Vendor Fee	9/13/41
A-21	27	Christian Torn et al	0.38	Vendor Fee	9/13/41
A-22	29	Mary Walters	0.24	Vendor Fee	9/13/41
A-23	31	Cornelius O'Keefe et al	0.15	Vendor Fee	9/13/41
A-24	32	Wilbur Reese McCullough et al	0.08	Vendor Fee	9/13/41
A-25	28	Albert V. Pack et al	0.15	Vendor Fee	9/13/41

Table 1-3. Property Acquisition and Conveyance Summary (continued)

Tract Number	Index No.	Previous Land Owner	Acreage	Type of Acquisition	Date
A-26	19	C. Raymond Levis	0.72	Vendor Fee	9/13/41
A-27	33	Mabel Paul et al	2.64	Vendor Fee	9/13/41
A-28	54	Rosine Schlaile	1.14	Vendor Fee	9/13/41
B-1	52	Ernest E. Draper et al	0.24	Vendor Fee	9/13/41
B-2	51	Herbert W. Slater et al	0.10	Vendor Fee	9/13/41
B-3	50	Frank M. Biser et al	0.10	Vendor Fee	9/13/41
B-4	49	Salvatore Loiacone et al	0.10	Vendor Fee	9/13/41
B-5	48	Salvatore Loiacone et al	0.10	Vendor Fee	9/13/41
B-6	47	Roy Harrison Rodgers et al	0.10	Vendor Fee	9/13/41
B-7	46	Mary Walters et al	1.04	Vendor Fee	9/13/41
B-8	45	George C. Kahl et al	0.22	Vendor Fee	9/13/41
B-9	44	T. Bayard Williams et al	0.25	Vendor Fee	9/13/41
B-10	34	Susanna M. Hopwood et al	0.14	Vendor Fee	9/13/41
B-11	35	Susanna M. Hopwood et al	0.10	Vendor Fee	9/13/41
B-12	36	Giulio Trecannelli et al	0.10	Vendor Fee	9/13/41
B-12 1/2	37	Giulio Trecannelli et al	0.10	Vendor Fee	8/22/41
B-13	39	Esther Kibler et al	0.10	Vendor Fee	9/13/41
B-14	40	T. Bayard Williams et al	0.06	Vendor Fee	9/13/41
B-15	41	Willie Street et al	0.10	Vendor Fee	9/13/41
C-1-1	55	The Dundalk Co.	4.79	Vendor Fee	9/13/41
C-1-2A	58	Erestis F. Gladfelter et al	0.18	Vendor Fee	9/13/41
C-1-2B	56	Erestis S. Gladfelter et al	0.18	Vendor Fee	9/13/41
C-1-3	57	Orestus S. Gladfelter et al	0.28	Vendor Fee	9/13/41
C-1-4	59	Dora M. Schriver et al	0.18	Vendor Fee	9/13/41
C-1-5	60	Rosine Schlaile (Widow)	0.64	Vendor Fee	9/13/41
C-1-6	61	Emidio Pignatti et al	0.39	Vendor Fee	9/13/41
C-1-7	62	Wallace J. Nimmo et al	0.20	Vendor Fee	9/13/41
C-1-8	63	Sadye V. Nimmo et al	0.14	Vendor Fee	9/13/41
C-1-9	64	John Moravec et al	0.20	Vendor Fee	9/13/41
C-1-10	65	Ernest E. Draper et al	0.30	Vendor Fee	9/13/41
C-1-11	66	John Salaba et al	0.20	Vendor Fee	9/13/41
C-1-12	67	John Adams et al	0.24	Vendor Fee	9/13/41
C-1-13	68	American Homes Corporation	0.15	Vendor Fee	9/13/41
C-1-14	69	William Halenar et al	0.18	Vendor Fee	9/13/41
C-1-15	70	Philip Montague et al	0.37	Vendor Fee	9/13/41
C-2-1	77	The Dundalk Co.	7.52	Vendor Fee	9/13/41
C-2-2	78	Joseph Basar et al	0.10	Vendor Fee	9/13/41
C-3-1	72	The Dundalk Co.	1.09	Vendor Fee	9/13/41
C-3-2	73	Lillian E. Myers et al	0.18	Vendor Fee	9/13/41
C-3-3	74	Oliver J. Pecher et al	0.28	Vendor Fee	9/13/41
C-3-4	75	Lawrence Moh DeHaven et al	0.18	Vendor Fee	9/13/41

Table 1-3. Property Acquisition and Conveyance Summary (continued)

Tract Number	Index No.	Previous Land Owner	Acreage	Type of Acquisition	Date
C-3-5	76	Julia Petrush et al	0.18	Vendor Fee	9/13/41
D-1	79	Safe Deposit & Trust Co. et al	33.66	Vendor Fee	9/13/41
N/A	*	Streets and Alleys	5.61	Vendor Fee	5/3/41
80	80	The Dundalk Co.	7.28	Vendor Fee	12/24/42
81	81	Richard T. Merrit et ux	0.34	Vendor Fee	2/6/43
82	82	Alexander H. Schultz est.	99.61	Vendor Fee	12/2/42
83	83	Natural Accretion & Artificial Fill	14.90	Vendor Fee	5/3/41
87	87	The Dundalk Co.	0.18	Vendor Fee	4/11/55
A	A	Dept. of Agriculture	17.42	Use Permit	5/26/42
85L	85	B. & O. R. R. Co.	N/A	Agreement W-18-010-ENG-195	8/4/43
86	86	B. & O. R. R. Co.	N/A	Lease No. 49-080-ENG-463	8/16/50
88	88	B. & O. R. R. Co.	N/A	Lease No. 49-080-ENG-4198	5/16/58
Conveyances					
N/A	N/A	Navy Department	2.11	Transferred	4/16/42
N/A	N/A	Public Buildings Administration	17.42	Transferred	11/1/43
N/A	N/A	B. & O. R. R. Co.	0.32	Vendor Fee	3/12/45
N/A	N/A	B. & O. R. R. Co.	0.58	Vendor Fee	3/12/45
N/A	N/A	Baltimore Signal Depot Schultz Farm	107.23	Reassigned	7/1/49
N/A	N/A	General Motors Corp.	5.15	Vendor Fee	8/28/62
N/A	N/A	General Motors Corp.	0.08	Vendor Fee	1/11/66
N/A	N/A	USARC-Jecelin, MD	5.73	Vendor Fee	9/18/72
N/A	N/A	Mayor and City Council of Baltimore City	183.70	Vendor Fee	10/18/77
N/A	N/A	Baltimore County, MD	4.66	Vendor Fee	4/1/80
N/A	N/A	Mayor and City Council of Baltimore City Maryland	38.74	Vendor Fee	5/5/80
N/A	N/A	Cummins Apartments	6.6	Transferred	6/96

N/A Not Applicable

* Titles to streets and alleys revert to abutting properties upon abandonment of public use.

The latest property transfer occurred in June 1996, when approximately 6.6 acres, which is the property underlying Cummins Apartment (PUCA), was transferred to Cummins Apartments. PUCA is discussed in a separate EBS (ICF KE, 1997). As of December 10, 1998, there were only two original tracts of Fort Holabird: 7.92 acres of land where the Army DIS was located and approximately 6 acres of land where the Crime Records Center (CRC) was located. The CRC was selected for closure under BRAC 88 (BRAC I) and will not be discussed further in this BCP.

The Fort Holabird DIS property consists of Building 320, a trailer, a storage warehouse, two parking lots, and open space. Constructed in 1954, Building 320 is a three-story reinforced concrete structure with an area of 86,000 square feet (ft²). From 1954 to 1972, the building was used for training by the Army Intelligence School. From 1972 to July 1996, the building housed the Investigative Controls and Automation Directorate under the Department of Defense Investigative Service, which is involved in conducting personnel security checks and clearance for DoD employees and other federal government

entities. The warehouse was constructed around 1986 and has an area of 4,000 square feet. It was used for storage of office equipment and supplies, and some grounds maintenance supplies. The trailer has an area of 1,200 square feet and was used to hold training classes. Approximately 40% of the property is paved. A fence outlines the boundary of the property. The trailer and the guard post were removed in July 1996 after Fort Holabird DIS moved operations to Linthicum, MD.

1.5.3 Tenants

The only tenant on the Fort Holabird DIS property at the time the operations were moved to Linthicum, MD, in July 1996 was the Investigative Controls and Automation Directorate of the Department of Defense Investigative Service. There are no tenants remaining on the Fort Holabird DIS property.

Table 1-4. Current Significant On-Post Tenants at Fort Holabird DIS

Tenant	Location	Mission/Operation
There are no on-post tenants at Fort Holabird DIS at this time. The former tenant, Investigative Controls and Automation Directorate of the Department of Defense Investigative Service, relocated to Linthicum, MD in July 1996.		

1.5.4 Environmental Setting

This section provides a brief description of the environmental setting at Fort Holabird DIS including climatology, topography, hydrology, water usage, physiography, soils, geology, hydrogeology, and sensitive environments.

1.5.4.1 Climatology

The average annual temperature in Baltimore is 55.1 degrees Fahrenheit (° F) and varies moderately with the seasons. The coldest month of the year is January with a normal monthly temperature of 32.7° F, daily maximum of 41.0° F, and daily minimum of 24.3° F. Temperatures above 90° F occur an average of 30 days per year (ERM, 1994).

Prevailing winds in Baltimore are from a westerly direction with a slight seasonal variation. Winds are from the northwest in the winter and from the southwest in the summer. Coastal storms may produce heavy rain in the warmer months and heavy snow in the colder months in addition to high winds and coastal flooding. Thunderstorms may become severe and produce heavy rains, high winds, and hail. Precipitation is evenly distributed throughout the year. Normal yearly precipitation is 41.84 inches with an average snowfall of 21.6 inches. August is the wettest month with 4.62 inches of precipitation, and February is the driest month with a normal precipitation of 2.98 inches. Snow seldom remains on the ground for an extended period of time (ERM, 1994).

1.5.4.2 Topography

Fort Holabird DIS is located on a peninsula between two inlets of the Chesapeake Bay, the Patapsco and Back Rivers. The land is relatively flat with elevations varying from 15 to 20 feet above mean sea level (msl). The nearby area is completely urbanized with only a few trees and shrubs to the north along Colgate Creek, and to the south and southwest along the property boundary.

1.5.4.3 Hydrology

The hydrology at Fort Holabird DIS includes Colgate Creek and Patapsco River which eventually drain into the Chesapeake Bay. There are no standing surface waters located on the Fort Holabird DIS property. Colgate Creek is located approximately 2,000 feet north and 9,000 feet east of the property, and the Patapsco River is located approximately one-half mile southwest of the property. Surface water drains into Colgate Creek either by direct surface runoff or by conveyance through storm sewers. Colgate Creek empties into the Patapsco River, an inlet of the Chesapeake Bay that is heavily used by marine traffic and has a great deal of heavy industry located on its banks.

1.5.4.4 Water Usage

Water usage at Fort Holabird DIS is obtained from the Baltimore City municipal water system. Municipal water is obtained from surface water north of the city. Although there are several wells in the Fort Holabird DIS area which derive water for industrial purposes from the Patuxent Formation, groundwater is not used as drinking water.

1.5.4.5 Physiography and Soil

Natural soil profiles at Fort Holabird DIS have been disturbed by earth-moving activities over the years. However, a certain percentage of the natural soil profile can be found, typically buried under fill material. This area has been mapped by the United States Soil Conservation Service (USSCS) as a complex of the Beltsville soil series and urban soils. The Beltsville soil has developed from stratified Coastal Plain sediments. In a typical natural profile, the Beltsville soil series is characterized by a restrictive zone in the soil profile occurring between 18 to 36 inches below the ground surface. This restriction results in slow water movement through the upper portion of the soil, creating a temporary shallow perched water table during wetter times of the year. Soil textures of the Beltsville soil profile range from a silty loam to a gravely, sandy loam.

1.5.4.6 Geology and Hydrogeology

The top geological strata in the Fort Holabird DIS area consists of a 10-foot thick layer of sediment. Below that layer is the Patapsco Formation, which is made up of sand and interbedded with layers of silty clay predominantly made up of quartz, illite, and kaolinite. The Patapsco Formation is approximately 60-foot thick. The next layer is the Arundel Formation, which is a clay layer approximately 130-foot thick interbedded with lenses of sandy silt containing traces of lignitic material. The clay minerals are predominantly kaolinite and illite. The Patuxent Formation is the layer just above the bedrock, and is made up of sand and gravel with interbedded lenses of silty clay with quartz as the predominant mineral. The bedrock consists of a complex assemblage of schist, gneiss, and gabbro.

The principal groundwater aquifers in the region are the Patapsco and Patuxent Formations. The Patapsco Formation is the layer capable of yielding large quantities of water. However, the formation is brackish due to the encroachment of seawater, and therefore, not useable as a water source. The Patuxent Formation is the most important water-bearing formation in the Baltimore area. This formation is capable of yielding large quantities of water, and is not brackish in the Fort Holabird DIS area. These aquifers are separated by the Arundel Clay Formation.

Monitoring wells installed on the Fort Holabird DIS property indicate that the depth to groundwater is generally less than 10 feet. The low elevation (15 to 20 feet msl) and the proximity to the Patapsco River contribute to the high water table. The groundwater flow direction has not been determined for the area. As suggested in the Physiography and Soils section, a confining clay layer is encountered between 18 to 36 inches below the ground surface which may inhibit the transport of surface spills to deeper groundwater aquifers.

1.5.4.7 Sensitive Environments

A limited number of ornamental trees and shrubs exist on Fort Holabird DIS and the surrounding area. The floral and faunal species found at the site are typical of highly disturbed urban and industrial environments. Fort Holabird DIS does not contain any wetlands and is not in an established floodplain area. Also, no endangered species are known to inhabit the property.

There are no known archaeological sites, significant cultural resources, cemeteries, burial grounds, historic/architectural investigations, or National Register sites identified on, or associated with, the Fort Holabird DIS property (USACE, 1991).

1.5.4.8 Hazardous Substances Storage, Disposal, and Waste Management Practices

Fort Holabird DIS was not classified as a small quantity hazardous waste generator. Hazardous substances were produced in very small quantities, so a Resource Conservation and Recovery Act (RCRA) identification number was not assigned to the installation. One-time permits for temporary

storage of hazardous wastes were obtained when necessary; however, no information is available on whether any RCRA permits were issued.

Hazardous substances were stored and used in various operations of Building 320 and in the warehouse. They include: developer, fixer, and anhydrous ammonia for microfilm processing; paints for building maintenance; batteries as backup power for the computers; halon 1301 for fire extinguishing; HCFC for air conditioning; propane for the boilers; miscellaneous cleaning supplies; and typical office inks and toners. Pesticides, herbicides, fungicides, insecticides, rodenticides, paints, gasoline, oil, and hydraulic fluid were stored in the warehouse. Barrels and buckets of refrigerant oil (CCl₃F) were observed stacked in the corner of the boiler room, and an unmarked 55-gallon drum bulging at the bottom was observed outside the southwest side of the building next to the chimney during an ICF KE site visit in October 1995. Fuel oils were stored in above-ground storage tanks (ASTs) outside and were regularly refilled. Table 1-5 outlines hazardous waste generating activities.

Much of the hazardous materials were consumed. Some spent containers entered the municipal solid waste (MSW) stream, some materials were recycled through the supplier, and others have been moved to Linthicum, MD with the move of DIS. Table 1-6 identifies the historical hazardous substance generating activities by type of operation. Figure 1-2 identifies the current location of USTs, ASTs, and past hazardous substance activities.

1.6 OFF-POST PROPERTIES

There are no off-post properties for Fort Holabird DIS.

1.7 ADJACENT PROPERTIES

Fort Holabird DIS is an industrial-zoned property in the Holabird Industrial Park. The surrounding properties consist primarily of commercial and industrial usages. Properties directly adjacent to the Fort Holabird DIS property include:

Eastern Industrial Medical Center	1833 Portal Street
Adcrafters Inc.	1821 Portal Street
John D. Lucas Printing Co.	1820 Portal Street
Poly-Seal Corporation	1810 Portal Street
Maryland Screen Printers	1801 Portal Street
GPGG Chemical Corp.	1901 Portal Street
ATCO Rubber Co.	1900 Portal Street
Gascoyne Laboratories	2101 Van Deman Street
Thrasher Group	2201 Van Deman Street
Red Star Yeast	2100 Van Deman Street
Riggs Distler & Co. Inc.	2111 Van Deman Street
TNEMEC Company Inc.	2300 Edgewater Ave
A.Z. Bogert Co. Inc.	2320 Edgewater Ave

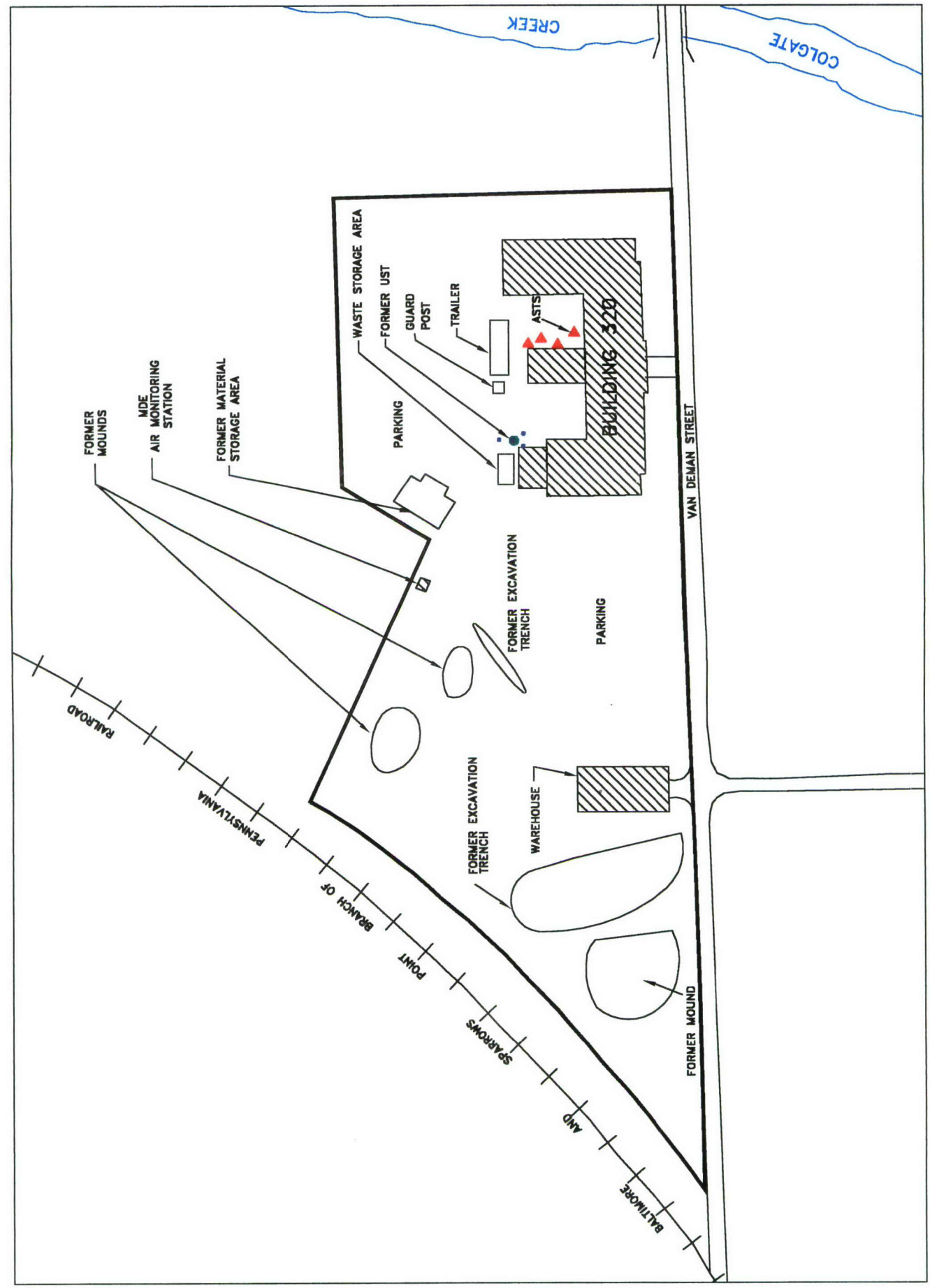
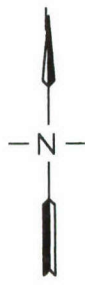
These properties are used primarily for commercial purposes such as corporate centers, offices, and service centers with the exception of Red Star Yeast which maintains manufacturing operations (DPW, 1993, 1984). Figure 1-3 shows Fort Holabird DIS surrounding vicinity community and land use. Land use within the Park is controlled by three mechanisms: the Baltimore City Zoning Ordinance, the Critical Area Management Plan, and the Declaration of Covenants and Easements (BDC, 1997).

Table 1-5. Hazardous Waste Generating Activities for Fort Holabird DIS

Years Stored	Location	Facility/ Operation	Activity	Name of Waste Material	Amount Stored	Disposition
72-96	Bldg 320	General	Laser Printing and Copier	Inks and Toners	misc.	Used. Cartridges were recycled or disposed of by the MSW contractor.
74-96			Diazo Machine	Anhydrous Ammonia	(2) 50-lb canisters	Used. Canisters were returned to supplier and refilled.
74-96			Film Development	Developer	1-gal containers	Liquid waste stream was discharged down the drain into the municipal sanitary sewer system after use. Containers entered MSW waste stream.
74-96				Fixer	1-gal containers	
72-96		General		Solvents	misc.	Used. Containers were disposed of by the MSW contractor.
72-96				Paints	1-5 gal containers	
72-96			Fire Extinguishing	Halon 1301	(4) 487-lb tanks	Used. Expired units were removed and recycled through the manufacturer.
72-96				Batteries	60 cells	
72-96	Boiler Room		Backup Power	HCFC-22	100-lbs	Relocated to new site at Linthicum.
72-96			Air Conditioning	HCFC-113	100-lbs	Used.
72-96			Chiller	Refrigerant Oil (CCl ₃ F)	120-lbs	Moved to Ft. Meade for disposal as of July 1996.
72-96			Storage	Unknown	55-gal drum	Opened and disposed of by the contractor, Valley Protein.
72-96	Warehouse	Storage		Paint	35-gals	Disposed of by the MSW contractor. Used. Stored amounts have been relocated to new site at Linthicum as of July 1996.
85-96				Gasoline	40-gals	
85-96				Oil	3-5 gals	
85-96				Hydraulic Fluid	3-5 gals	
85-96	Trailer	Various	Copier	Toner	Several pallets	Used. Cartridges were recycled or disposed of by the MSW contractor. Used. Disposed of by the MSW contractor.
85-96				Insecticide	1-2 aerosol cans	
85-96				Toner	1-2 cartridges	
85-96						

Table 1-6. History of Operations at Fort Holabird DIS

Period	Type of Operation	Hazardous Substance Activities	Map Reference
1917	Quartermaster Mechanical Repair Unit	Unknown	None
1954-1972	Army Intelligence School Training Unit	Incineration, maintenance operations, fuel storage & dispensing, waste disposal, construction, hazardous material/waste usage and storage.	None
1972-1996	Investigative Controls & Automations Directorate	Maintenance operations, fuel storage & dispensing, waste disposal, construction, hazardous material/waste usage and storage.	Figure 1-2



LEGEND

- BUILDING/STRUCTURE
- REMOVED BUILDING/STRUCTURE OR
DELINEATED FORMER STORAGE LOCATION
- ROADS, PARKING, ETC, PAVED
- BRAC PROPERTY BOUNDARY
- RAILROAD
- ASTS
- USTS
- MONITORING WELL

DEPARTMENT OF THE ARMY

U.S. Army Environmental Center

CONTRACT NO. DACA31-94-D-0064

FIGURE 1-2
FORT HOLABIRD DIS

2113 Environmental Parts, Road
Inventory, and Hazardous Waste
(409) 812-4350

LOCATION OF USTs
ASTS, AND PAST
HAZARDOUS SUBSTANCE
ACTIVITIES

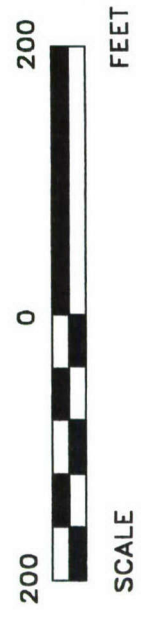
PREPARED BY: KCP KASER ENGINEERS

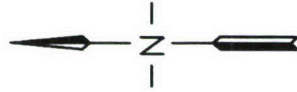
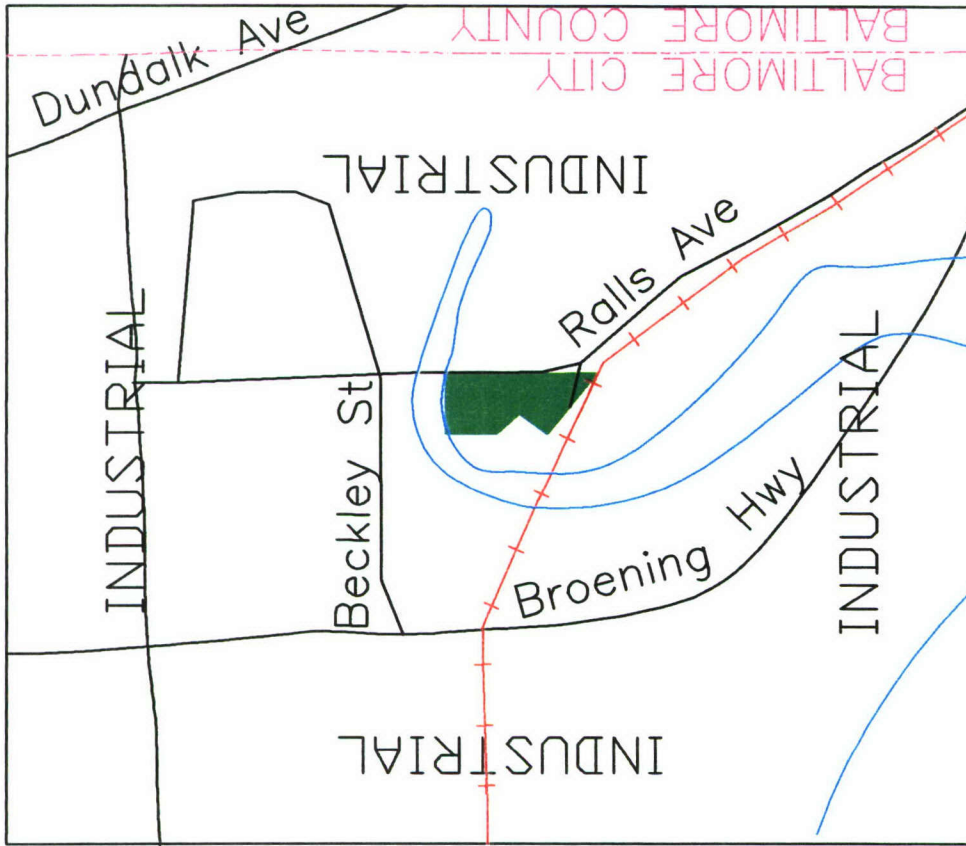
TASK NO: 66226

CHECKED BY: T. LONIG

DATE: 10-25-98

FHBCP1-2





DEPARTMENT OF THE ARMY

U.S. Army Environmental Center

CONTRACT NO. DACA31-94-D-0064

FIGURE 1-3
FORT HOLABIRD DNS

ICP KAISER ENGINEERS
2113 Emmorton Park Road
Farmingdale, Maryland 21040
(410) 612-6366

VICINITY MAP AND
COMMUNITY
LAND USE

PREPARED	L.B. DEE	TASK NO	66226
CHECKED	RRC	ICF DNS NO.	FHBCP1-3
DATE	12-11-98		



2.0 PROPERTY DISPOSAL AND REUSE PLAN

This section describes the status of the disposal planning process for Fort Holabird DIS and the relationship between the disposal process and environmental programs at the installation. It also identifies property transfer methods being utilized or considered in the reuse process. All closure activities are scheduled for completion by September 30, 2001. In the interim, the property has been under caretaker status which involves providing security, necessary maintenance, and restricting public access to the property (USACE, 1997c).

2.1 STATUS OF DISPOSAL AND REUSE PLAN

The disposal and transfer of Fort Holabird DIS involves three interrelated activities: the National Environmental Policy Act (NEPA) documentation process, development of a disposal plan, and development of a community reuse plan. Predisposal activities include cleaning up the contaminated sites, identifying interim uses, and establishing caretaker status. An Environmental Assessment (EA) was prepared in April 1997 as part of the NEPA documentation requirement (USACE, 1997c). Information in this section reflects findings from the EA report and the Reuse Plan prepared by the City of Baltimore Development Corporation (BDC). Disposal activities include an extensive process that screens the property for potential reuse entities. Screening is a process that offers the available property to interested parties in a prioritized matrix. It is performed at the federal, state, and local levels. Reuse is an indirect, or secondary, effect of disposal of BRAC real property.

The local community is charged with establishing a reuse committee, which produces a reuse-redevelopment plan for the available real property. Reuse planning is coordinated with federal, state, and local agencies with extensive community involvement (USACE, 1997c). Following the approval of Fort Holabird DIS for closure in 1995, the Mayor of Baltimore designated the BDC, the City's economic development agency, and the Holabird Working Group, a committee consisting of businesses and community representatives, as the Local Redevelopment authority (LRA). The LRA started meeting in 1995, and in August 1997 issued a proposal for the reuse of the property (BDC, 1997). Preliminary discussions with the Army also indicates that the Fort Holabird DIS property will be transferred to the BDC for redevelopment using either economic development conveyance, negotiated sale, or donations (BDC, 1998). Figure 2-1 provides a structure for the disposal and reuse of the DIS property. Table 2-1 provides a summary of effects of proposed disposal alternatives and reuse scenarios based on the findings of the EA report.

2.1.1 Interim Caretaker Status

As the transfer of the mission at the DIS is completed, utility systems have been placed in an inactive caretaker status until new owners or interim lessees take possession of the property. Army Regulation (AR) 210-17, "Inactivation of Installations," requires that: "Inactive facilities and areas be maintained to the extent necessary to insure, as applicable, weather-tightness, structural soundness, protection against fire and erosion, conservation of natural resources, and the prevention of major deterioration..." There are no interim uses proposed for the Fort Holabird DIS property at this time. No immediate "like" users or potential lessees for the facility have been identified. The facility, therefore, remains under caretaker status. Specific caretaker actions are as follows:

- Inspecting and maintaining utility systems, telecommunications, and roads to the extent necessary to avoid irreparable deterioration, and using the utility systems as necessary to avoid their deterioration;
- Maintaining the landscapes around unoccupied structures periodically, as necessary to protect the structures from fires or nuisance conditions;
- Maintaining access onto the installation to permit service and maintenance of publicly or privately owned utility or infrastructure systems;
- Continuing security patrols on the installation, maintaining security systems and perimeter fences, and adding interior fencing around hazardous waste sites, depending on the length of time that areas may remain in caretaker status;

- Maintaining programs for managing natural and cultural resources consistent with Army regulations and policies;
- Continuing land-management programs such as controlling pests, controlling erosion, and removing trees.

2.1.2 Disposal Alternatives

Potential disposal alternatives for the DIS property are identified in the EA report (USACE, 1997c) as encumbered disposal, unencumbered disposal, and no action. These three alternatives are described below. The Army's preferred alternative for the DIS property is encumbered disposal (USACE 1997c).

2.1.2.1 Encumbered Disposal Alternative

Encumbrances are natural or human-imposed constraints on future reuse or development of a property. Encumbrances can support future Army interests, regulatory and statutory compliance, hastened availability of property, and mitigation requirements. Encumbrances can include restrictions related to protecting cultural resources, using or developing wetlands, protecting or conserving species and wildlife, and securing easements to allow continued Army remediation or monitoring activities on portions of a property. The creation of encumbrances must be weighed against the loss of land-use flexibility, possible loss of market value, and the potential for increased management burdens on subsequent owners. The encumbered alternative is formulated to consider the type and degree of reuse constraints to be imposed on future owners by the Army, as a condition of disposal. If contamination is found and remediation is required, it will be necessary to retain access rights to allow completion of any additional remediation in the future. Land use restrictions may also be necessary to protect human health and the environment.

Encumbered disposal is the preferred alternative for the DIS property. Potential encumbrances identified for the disposal of the DIS include ensuring access to the property for environmental remediation activities. Recent sampling results show that only the former UST location remains a potentially contaminated site, which may require access for environmental remediation activities. Three other sampling locations, a material storage area, former excavation trenches and mounds, and an area adjacent to the parking lot were found to be clean. There are no encumbrances associated with historic or natural resources. The Army's compliance with the requirements for screening excess property, coordinating with the Local Redevelopment Authority (LRA), and executing real estate conveyance actions requires substantial time and effort. The no-action caretaker alternative will probably be exercised for some time in order to accommodate all of these factors before proceeding with encumbered disposal of the DIS property.

2.1.2.2 Unencumbered Disposal Alternative

The unencumbered disposal alternative identifies and evaluates the potential to remove all encumbrances prior to property transfer. This alternative attempts to dispose of property that is free of easements or mitigation measures, thereby allowing property to be disposed of with fewer or no Army-imposed restrictions on future use. However, removing all encumbrances before disposal may delay transfer. It would require completing all remedial activities, including long term monitoring. At the DIS property, only one location remains which would require potential ongoing remediation. The former UST location may require additional characterization of soil contamination and monitoring of groundwater. If this location were determined to be clean with no follow-up testing or monitoring required, unencumbered disposal would be possible.

2.1.2.3 No Action

NEPA documents refer to a continuation of existing conditions without the implementation of the proposed action as the no-action alternative. Under this alternative, the property would continue to be maintained indefinitely under caretaker status, in accordance with ARs 210-17, "Inactivation of Installations." The property would be available for future use by the Army. Details of requirements of caretaker status are presented in Section 2.1.1, Interim Caretaker Status.

2.1.3 Reuse Scenarios

The regulation of the President's Council on Environmental Quality (CEQ) require that the environmental effects of certain major federal actions be evaluated by analyzing direct and indirect effects. Direct effects are effects that are caused by the action and occur at the same time and place. Indirect effects occur later in time or in a place that is removed from the actions. The CEQ regulations also require evaluating reasonably foreseeable actions, without limitation on the party that is conducting them, and evaluating consequent environmental impacts. Regardless of the method of disposal, timing, or the identity of the new owners, reuse of the DIS property is reasonably foreseeable.

The entire DIS parcel and all its surrounding properties are zoned M-3, heavy industrial, allowing for a wide range of commercial and industrial uses. Surrounding uses range from a laboratory that measures water quality to a facility that manufactures paint. Regulations governing the zoning districts are designed "to promote growth and stability of industrial and related development; to strengthen the economic base of the City; and to preserve and expand the City's tax base and employment potential." Residential units, other than watchmen quarters are prohibited in all industrial districts. Development within Holabird Industrial Park is also restricted by the Critical Area Management Program to foster sensitive development along the City's shoreline areas, and a Declaration of Covenants and Easements to provide for an industrial park of the highest quality and character by enforcing high standards of maintenance and operations of lots, open spaces, roadways, and other facilities. Some examples of unlikely reuses due to conflict of the above considerations include heavy industrial uses, such as landfills or metal and petroleum refining, and incompatible uses such as residential development, prisons, or schools.

Three conceptual reuse scenarios were developed for the DIS property based on varying land-use intensities: High intensity reuse (HIR), middle intensity reuse (MIR), and low intensity reuse (LIR). These reuse scenarios are planning-level concepts and are not intended to convey the actual site-specific reuse development of the property after disposal. These reuse scenarios were formulated by considering the following:

- Existing conditions at the site and current use of the property;
- Consulting with local planning authorities;
- Considering local land-use plans and policies;
- Surrounding land uses;
- Zoning regulations;
- Identifying market interests;
- Considering current uses of the property;
- Recent development trends in the area; and
- Possible encumbrances to the property.

2.1.3.1 High-Intensity Reuse

High-intensity reuse (HIR) assumes the property will be used at a maximum feasible intensity consistent with local zoning requirements. The scenario assumes that the entire 8-acres will be used for heavy industrial development. It projects an employment density of 624 ft² of space per employee representing a total employment of approximately 560 people assuming minimal open space, buffer, roads, and other undeveloped areas. On the basis of access, visibility, current and projected office and industrial demand, and zoning, the HIR scenario is feasible for the DIS property. However, its small size makes a less intense usage of the site more likely.

2.1.3.2 Middle-Intensity Reuse

Middle-intensity reuse (MIR) assumes the property will be used at a moderate level of land-use intensity, approximately midpoint between the HIR and LIR scenarios. The scenario assumes there will

be approximately 100,000 gross square feet for light industrial use, research, and development. It projects an employee density of 605 ft² of space per employee generating a total employment of approximately 165 people. The amount of space developed in the MIR scenario is less than that of the HIR scenario, resulting in fewer people employed.

2.1.3.3 Low-Intensity Reuse

Low-intensity reuse (LIR) assumes a continuation of the current administrative use of the site with new tenants or multiple tenants in either the existing structure or a new structure with a maximum size of 100,000 ft². Employment density is estimated at 333 ft² of space per employee creating a total employment of 300 persons. The LIR scenario provides higher employee density because it projects administrative use, which involves greater employee density than industrial use.

2.2 RELATIONSHIP TO ENVIRONMENTAL PROGRAMS

Disposal and reuse activities at Fort Holabird DIS are intimately linked to environmental investigations, restoration, and compliance activities for two basic reasons:

- Federal property transfers to nonfederal parties are governed by CERCLA Section 120(h)(3)(B)(i); and
- Residual contamination may remain on certain properties after remedial actions have been completed or put into place, thereby restricting the future use of those properties.

Section 120(h)(3)(B)(i) of CERCLA requires deeds for federal transfer of previously contaminated property to contain a covenant that all RAs necessary to protect human health and the environment have been taken. The 1992 CERFA amendment to CERCLA provided clarification to the phrase "have been taken." This clarification states that all remedial action has been taken if the construction and installation of an approved remedial design has been completed, and the remedy has been demonstrated to MDE to be operating properly and successfully. It further states that the carrying out of long-term pumping and treating, or operation and maintenance, after the remedy has been demonstrated to MDE to be operating properly and successfully, does not preclude the transfer of the property. This deed requirement applies only to property on which a hazardous substance was stored for one year or more, or is known to have been disposed of or released. Thus, any required remedial and/or removal response actions must be selected and implemented for such contaminated properties before transfers to private parties can occur.

Table 2-2 presents summary information on the disposal and reuse parcels and takes into consideration compliance to CERCLA 120(h) and the potential of residual contamination. Fort Holabird has not been divided into parcels so the entire property could be transferred by deed all at once. The strategy and schedule for Fort Holabird DIS, when developed, will be designed to streamline and expedite the necessary response actions for the site in order to facilitate the earliest possible disposal and reuse activities.

2.3 PROPERTY TRANSFER METHODS

The various property transfer methods being utilized or considered in the disposal process at Fort Holabird DIS are described in this section. Transfer methods which may not be currently applicable but which may be considered in future disposal planning actions at the installation have also been identified.

2.3.1 Federal Transfer of Property

Under this action, the Army would transfer administrative or jurisdictional control to another federal agency. Transfer actions between Federal agencies have not been considered for Fort Holabird DIS.

2.3.2 Public Benefit Discount Conveyance

State or local government entities may obtain property at less than fair market value for uses that would benefit the public. Conveyances for the benefit of the public are typically granted for such uses as public airports, prisons, public education, recreation facilities, wildlife conservation, and historic

2.3.2 Public Benefit Discount Conveyance

State or local government entities may obtain property at less than fair market value for uses that would benefit the public. Conveyances for the benefit of the public are typically granted for such uses as public airports, prisons, public education, recreation facilities, wildlife conservation, and historic monuments. A conveyance that benefits the public must be sponsored by a federal agency if it is to be considered a transfer. The transfer of Fort Holabird DIS property using public benefit discount conveyance is not being considered at this time.

2.3.3 Economic Development Conveyance

The 1994 Defense Authorization Act provides for additional means of conveying property to redevelopment authorities at-or-below fair-market value using flexible payment terms under certain circumstances. If certain criteria are met for a rural installation, conveyance may be at no cost. The economic development conveyance is intended to promote economic development and create jobs in the local community. To qualify for this conveyance, an LRA must submit a request to the Department of the Army describing its proposed plan for economic development and its program for creating jobs. The BDC plans to submit a request for economic development conveyance (EDC) of the Fort Holabird DIS (BDC, 1998).

2.3.4 Negotiated Sale

Under this action, the Army would negotiate the sale of the property to state or local agencies at fair-market value. Unlike conveyances for the benefit of the public, negotiated sales to the public must obtain fair-market value for the property. In exceptional cases, a sale also could be negotiated with private entities. This is another possible alternative that can be used for the transfer of Fort Holabird DIS to the BDC (BDC, 1998).

2.3.5 Competitive Public Sale

Sale to the public would occur either through an invitation for bids or through an auction. There is no indication that the Fort Holabird DIS property will be disposed of by competitive public sales.

2.3.6 Widening of Public Highways

There is no indication at this time that widening of public highways is applicable to Fort Holabird DIS.

2.3.7 Donated Properties

The BDC plans to request the Department of the Army to donate the Fort Holabird DIS to the BDC (BDC, 1998).

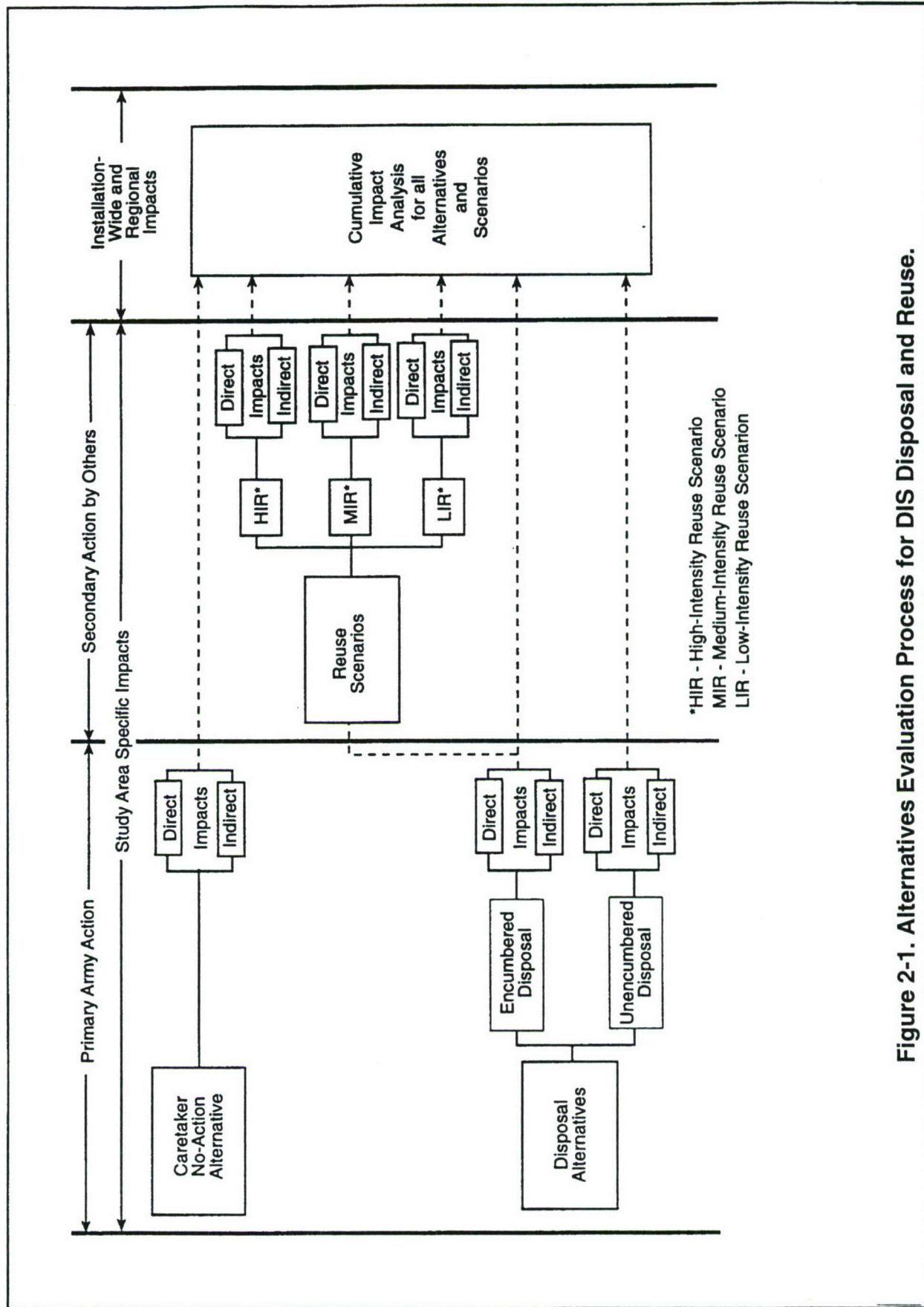


Figure 2-1. Alternatives Evaluation Process for DIS Disposal and Reuse.

Table 2-1. Summary of Effects of Proposed Disposal Alternatives and Reuse Scenarios.

Resource	High-Intensity Reuse	Medium-Intensity Reuse	Low-Intensity Reuse	Disposal of the DIS and No Action (Caretaker)
Climate	No impact.	No impact.	No impact.	No impact.
Land Use	No impact, compatible with surrounding land uses.	No impact, compatible with surrounding land uses.	No impact, compatible with surrounding land uses.	No impact, compatible with surrounding land uses.
Air Quality	No significant impacts expected. If the new heavy-industrial use will generate air emissions, a permit will be required that establishes limits on regulated pollutants from the MDE's Air and Radiation Agency.	No significant impacts expected. If the new heavy-industrial use will generate air emissions, a permit will be required that establishes limits on regulated pollutants from the MDE's Air and Radiation Agency.	No impact.	Emissions will be less because the boiler and emergency generator will operate less frequently and the number of vehicles going to and from the DIS will decrease.
Water Resources	No impacts because BMPs will be used and the total area of impervious surface is not expected to increase.	No impacts because BMPs will be used and the total area of impervious surface is not expected to increase.	No impacts because BMPs will be used and the total area of impervious surface is not expected to increase.	No impacts to groundwater. Surface-water runoff will be enhanced by the reduced pollutant loadings.
Geology	No impact.	No impact.	No impact.	No impact.
Soil	No impact.	No impact.	No impact.	No impact.
Topography	No impact.	No impact.	No impact.	No impact.
Infrastructure	No impact.	No impact.	No impact.	No impact.
Solid Waste	Minor impact. Generation is estimated at 233 tons per year. Approximately 100 tons are expected to be recyclable.	Minor impact. Generation is estimated at 233 tons per year. Approximately 100 tons are expected to be recyclable.	No impact, solid waste volumes generated and recycling levels should be similar to DIS levels.	No impact.
Traffic and Transportation	ADTs decrease by 878, morning peak-hour traffic decreases by 11 trips per day and evening peak hour traffic increases by 51 trips per day.	ADTs increase by 706, morning peak-hour traffic decreases by 98 trips per day, and evening peak hour traffic increases by 51 trips per day.	No impact. (Similar to baseline conditions.)	ADTs decrease by 1,404, morning peak-hour traffic increase by 187 trips per day.
Energy	No impact.	No impact.	No impact.	No impact.

- Source: (USACE: 1997c)

ACM Asbestos Containing Materials
ADT Average Daily Trip
BMP Best Management Practices

* Net effects of reuse, less baseline decreases caused by closure and realignment of DIS. None of the increases exceed the regional thresholds established by the EIFS model. As a result, none of the impacts are considered regionally significant.

Table 2-1. Summary of Effects of Proposed Disposal Alternatives and Reuse Scenarios (Continued)

Resource	High-Intensity Reuse	Medium-Intensity Reuse	Low-Intensity Reuse	Disposal of the DIS and No Action (Caretaker)
Hazardous Material and Toxic Wastes	Minimal impact, reuse activity may handle, store, and generate hazardous materials and wastes. However, the local, state, and federal agencies will require the reuser to comply with all local, state, and federal laws and regulations. Lead-based paint and ACM exist in Building 320. Remodeling or demolition of the building may require special handling procedures and disposal of the materials.	Minimal impact, reuse activity may handle, store, and generate hazardous materials and wastes. However, the local, state, and federal agencies will require the reuser to comply with all local, state, and federal laws and regulations. Lead-based paint and ACM exist in Building 320. Remodeling or demolition of the building may require special handling procedures and disposal of the materials.	No impact. Lead-based paint and ACM exist in Building 320. Remodeling or demolition of the building may require special handling procedures and disposal of the materials.	No impacts will occur because no wastes will be generated and all required remediation will be completed.
Biological Resources	No impact.	No impact.	No impact.	No impact.
Wetlands	No impact.	No impact.	No impact.	No impact.
Rare, Threatened, and Endangered Species	No impact.	No impact.	No impact.	No impact.
Cultural Resources	No impact.	No impact.	No impact.	No impact.
Demographics	No impact.	No impact.	No impact.	No impact.
Aesthetics	No impact.	No impact.	No impact.	Minimal impact; the Army will provide a reduced level of maintenance, but nuisance conditions will be prevented.
Noise	No impact.	No impact.	No impact.	No impact.
Public Health and Safety	An increase of two emergency calls is not significant.	An increase of two emergency calls is not significant.	No impact.	No impact.

ACM Asbestos-Containing Materials
FTE Full Time Equivalent

- Source: (USACE: 1997c)

Table 2-1. Summary of Effects of Proposed Disposal Alternatives and Reuse Scenarios (Continued)

Resource	High-Intensity Reuse	Medium-Intensity Reuse	Low-Intensity Reuse	Disposal of the DIS and No Action (Caretaker)
Regional Economic and Employment Structure*	Regional income increases by approximately \$110.5 million. Regional sales increase by approximately \$24.13 million. Approximately 1,206 FTE positions created.	Regional income decreases by approximately \$19,000. Regional sales increase by approximately \$6.56 million. Approximately 157 FTE positions lost. (Total effects are positive, but net effects are negative compared to DIS baseline.)	Regional income increases by approximately \$4.06 million. Regional sales increase by approximately \$28.32 million. Approximately 226 FTE positions created.	Economic activity lost to closure and realignment of DIS will not be replaced under no-action. Regional income decreases by approximately \$14.5 million. Regional sales decrease by approximately \$29.4 million. Approximately 580 FTE positions lost.
Fiscal Structure	Minor increase in tax revenue expected.	Minor increase in tax revenue expected.	No impact.	Revenues lost to closure and realignment of DIS will not be replaced under no-action.
Construction-Related Effects*	Approximately 215 FTEs created. Construction-related expenditures are estimated to be \$17.5 million. Construction-related income increases by \$4.67 million.	Approximately 61 FTEs created. Construction-related expenditures are estimated to be \$5.09 million. Construction-related income is expected to increase by \$1.34 million.	No impact. This reuse alternative assumes that the existing building will require minimal modification by a new administrative-type tenant.	No construction is proposed; no impacts will occur.
Housing	No impact.	No impact.	No impact.	No impact.
Schools	No impact.	No impact.	No impact.	No impact.
Family Support	No impact.	No impact.	No impact.	No impact.
Medical, Shops and Services, and Recreation	No impact.	No impact.	No impact.	No impact.
Installation Agreements	No impact.	No impact.	No impact.	No impact.
Permits and Authorizations	Building permits will be required if the existing building is modified or a new building is constructed. Additional federal, state, and local permits will be determined after a heavy industrial user is identified.	Building permits will be required if the existing building is modified or a new building is constructed. Additional federal, state, and local permits will be determined after a heavy industrial user is identified.	Building permits will be required if the existing building is modified or a new building is constructed. Additional federal, state, and local permits will be determined after a heavy industrial user is identified.	No impact.

FTE Full Time Equivalent
LOS Level of Service

* Net effects of reuse, less baseline decreases caused by closure and realignment of DIS. None of the increases exceed the regional thresholds established by the EIFS model. As a result, none of the impacts are considered regionally significant.

- Source: (USACE: 1997c)

Table 2-2. Reuse Parcel Data Summary

Parcel	Acres	Priority	Description and Proposed Reuse	Known Sites	Projected Transfer Date	Transfer Mechanism	Recipient
1	7.92	High	Economic Development	None	TBD	Negotiated Sale or Donation	Baltimore Development Corporation (BDC)

TBD To Be Determined

2.3.8 Interim Leases

There is no indication at this time that interim leases will occur at Fort Holabird DIS. Table 2-3 lists any legal agreements and/or interim leases of the property.

Table 2-3. Existing Legal Agreements/Interim Leases

Title of Interim Lease/Legal Agreement	Building Number/Areas	Date of Agreement	Reuse Parcel
There are no existing legal agreements/interim leases for the Fort Holabird DIS facility and property.			

2.3.9 Other Property Transfer Methods

Other property transfer methods are not applicable to Fort Holabird DIS at this time.



3.0 INSTALLATION-WIDE ENVIRONMENTAL PROGRAM STATUS

This section provides a summary of the current status of environmental restoration projects, installation-wide assessment activities, ongoing compliance activities, cultural and natural resources programs, and community involvement at Fort Holabird DIS. This section also describes the status of the environmental condition and suitability of transfer of the property.

3.1 ENVIRONMENTAL PROGRAM STATUS

The Environmental Management Office (EMO) at Fort Meade managed and coordinated some of the environmental programs at Fort Holabird DIS. Other activities were coordinated by DIS Chief of Facilities. The goal of these environmental programs was to protect human health and the environment. Currently, all tenant operations have been moved to Linthicum, MD as of July 1996, so there are no ongoing environmental management programs being conducted at Fort Holabird DIS (ICF KE, 1995a,b, Fort Meade, 1996, Fort Holabird, 1996). In October 1996, a sampling and analysis recommendation (SAR) was prepared by ICF KE (ICF KE, 1996a). Based on this, a Project Work Plan (PWP) was developed by USACE in June 1997 outlining sampling tasks at DIS (USACE, 1997b). Sampling was conducted in June 1997 and a draft data summary report was issued in October 1997 (USACE, 1997a).

3.1.1 Restoration Sites

Limited early action restoration activities have occurred at Fort Holabird DIS. To date, restoration activities include a UST removal and excavation of leaking underground lines related to the ASTs. The status of early actions taken at these sites is summarized in Table 3-1. The locations of these sites are identified in Figure 3-1.

Table 3-1. Environmental Restoration Early Action Status

Site	Action	Purpose	Status
UST Spill Area	UST was removed on July 7, 1986.	Source removal	NFA
	Four monitoring wells were installed in 1986. Sampling of the monitoring wells continued until February 1988.	Determine level of groundwater contamination	Continued characterization of petroleum contamination in groundwater recommended (USACE, 1997a)
AST Spill Area	A 50-foot boom was placed along the embankment of Colgate Creek on March 7, 1994.	Spill cleanup	NFA
	Hand-augured soils samples were taken (1994).	Determine lateral extent of release	NFA
	Contaminated soil was removed according to soil auguring findings in April 1994.	Remove residual contamination	NFA
	Underground lines were replaced with above-ground lines in April 1994.	Source removal	NFA
	Additional soil sampling was conducted in June 1997.	Confirmation that contamination no longer exists.	NFA

AST Above-ground Storage Tank
NFA No Further Action
UST Underground Storage Tank

3.1.2 Installation-Wide Source Discovery and Assessment Status

An installation-wide source discovery and assessment was performed in the form of an EBS. The EBS of Fort Holabird DIS was conducted in 1995 and the results of the survey are summarized in the draft EBS report and CERFA Letter Report (an appendix of the EBS) submitted in March 1996 (ICF KE, 1996b). The final EBS report was issued in April 1998 (ICF KE, 1998). The EBS summarizes the status of Fort Holabird's environmental programs, and the CERFA Letter summarizes the areas that were identified in the EBS as requiring environmental evaluation. Additional information regarding the CERFA parcels is presented in Section 3.4. Table 3-2 lists the AREEs identified in the EBS as having potential sources of contamination.

In support of the BRAC environmental restoration program, additional sampling was conducted in June 1997, to determine whether there have been releases of hazardous substances, pollutants, or contaminants to the AREEs identified in the EBS. A draft data summary report of environmental sampling (ES) activities was submitted in October 1997 (USACE, 1997a).

The investigation focused on four groundwater monitoring wells installed around the former UST area and on surface and subsurface soils in the former trench/mound areas, stained areas adjacent to the parking area, and background samples. A summary of the ES investigation and preliminary recommendations are presented in Table 3-3.

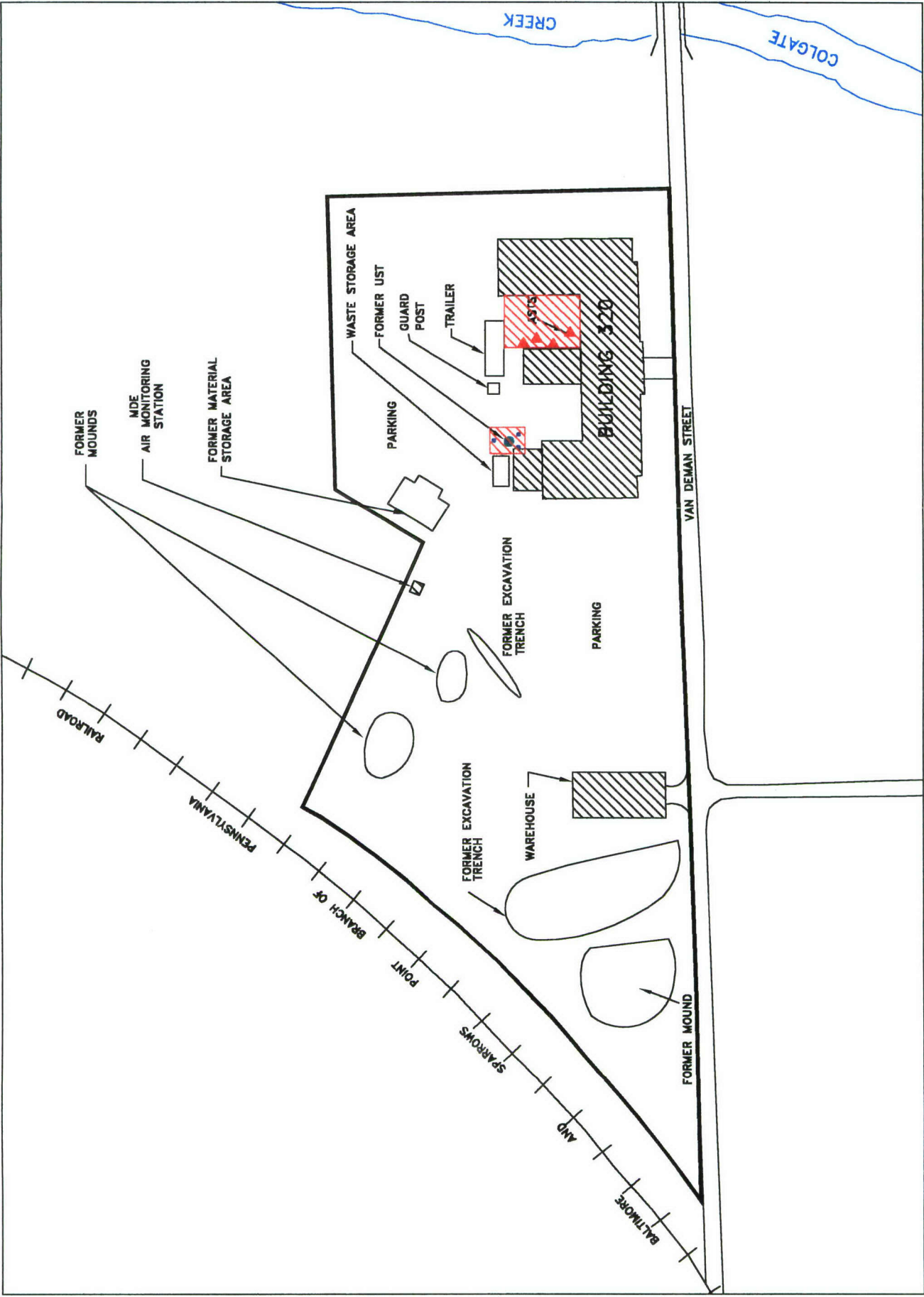
All four of the monitoring wells contained free product in the form of black, oily, and tar-like material. Groundwater samples from two of the wells were analyzed for benzene, toluene, ethyl benzene, and xylenes (BTEX), total petroleum hydrocarbons - diesel range organics (TPH-DRO), and TPH - gasoline range organics (TPH-GRO). The other two wells contained too much free product for the groundwater to be sampled. However, samples of the free product were collected and characterized. The contamination was determined to be a petroleum hydrocarbon product. There was no indication that other contaminants such as chlorinated solvents or heavy metals existed in the product. This is based on results of a sample collected from monitoring well MW-2 submitted for a variety of analyses to Gascoyne and Martel laboratories.

Surface and subsurface soil samples were collected at the former trench/mound areas shown in Figure 3-2. These areas were sampled for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides/polychlorinated biphenyls (PCBs), target analyte list (TAL) metals, and cyanide. At some of the locations, rubble, including concrete, steel, and bricks were encountered at approximately 2-feet below the ground surface. Low levels of VOCs, SVOCs, and pesticides were detected in the soil samples.

The only organic considered to be a risk factor in the soils at Fort Holabird is benzo(a)pyrene, which was detected at levels exceeding residential risk-based concentrations (RBCs) (0.088 mg/kg dry weight (dwt)) but less than industrial RBCs (0.78 mg/kg dwt). Background levels (0.13 mg/kg) also exceeded residential RBCs, but no industrial RBCs. Industrial RBCs is more appropriate for the area. Also, only the surface soil samples, and not the subsurface samples, exceeded residential RBCs. This finding indicates that activities in surrounding areas is a more likely source of contamination at Fort Holabird DIS than historical on-site dumping/trenching activities.

Beryllium is the only inorganic to exceed both the background and residential RBC levels (0.15 mg/kg dwt). Industrial RBC level (1.3 mg/kg dwt) was not exceeded. It should be noted that background concentrations for beryllium (0.22 mg/kg dwt) also exceeded residential RBCs and the U.S. Geological Survey (USGS) indicates that values equal or less than 1 mg/kg are expected for this region. It is likely that the beryllium levels in the samples (max 0.95 mg/kg dwt) are from naturally occurring sources. Of the five inorganics which had no RBC values, only calcium and magnesium exceeded both the USGS regional guidelines and background levels. Calcium and magnesium, being human nutrients, have very low toxicity and low risk to human health, and can be eliminated from further consideration of risk.

The ES report recommended that more focused investigation of the petroleum hydrocarbon contamination of the groundwater at Fort Holabird DIS be conducted. The sampling results indicated that the surface and subsurface soils are free of contamination at levels of concern, therefore, no further action is necessary for the surface and subsurface soils. Also, no additional restoration sites have been identified as a result of the EA investigation and additional sampling.



LEGEND

- BUILDING/STRUCTURE
- REMOVED BUILDING/STRUCTURE OR DELINEATED FORMER STORAGE LOCATION
- ROADS, PARKING, ETC., PAVED
- BRAC PROPERTY BOUNDARY
- RAILROAD
- ASTS
- USTS
- MONITORING WELL
- ENVIRONMENTAL RESORATION EARLY ACTION SITES

DEPARTMENT OF THE ARMY				U.S. Army Environmental Center	
CONTRACT NO. DACA31-84-D-0064		FIGURE 3-1 FORT HOLABIRD DIS			
2113 Emmertan Park Road Edgewood, Maryland 21040 (410) 812-4360		ENVIRONMENTAL RESTORATION EARLY ACTION SITES			
PREPARED BY		TASK NO.		FHBCP3-1	
T. LONGE		66226			
CHECKED		FHBCP3-1			
DATE		10-25-88			

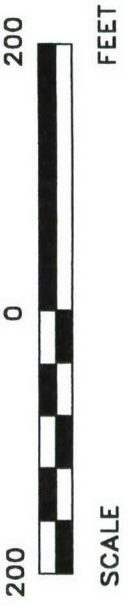


Table 3-2. Preliminary Location Summary of AREEs

AREE Number	AREE Description	Environmental Investigation Report Findings		Recommendations ^a
		EBS (1995)	ES (1997)	
N/A	UST Spill Area	Release of petroleum products	Petroleum hydrocarbon contamination detected	A more focused investigation of the petroleum hydrocarbon contamination of the groundwater be conducted.
N/A	AST Spill Area	Release of petroleum products	No residual contamination found in the soil	NFA
N/A	Waste Storage Area	Potential release of hazardous substances	No residual contamination found in the soil	NFA
N/A	Former Material Storage Areas (MSA)	Potential release of hazardous substances	No residual contamination found in the soil	NFA
N/A	Former Excavation Trenches and Mounds	Potential release of hazardous substances	No residual contamination found in the soil	NFA

^a Based on environmental sampling conducted in June 1997.

AREE Area Requiring Environmental Evaluation
 EBS Environmental Baseline Survey (ICF KE, 1998)
 ES Environmental Sampling (USACE, 1997a)
 N/A Not Applicable
 NFA No Further Action

Table 3-3. Environmental Restoration Site/Study Area Summary

OU	Task No. ^a	CERFA Parcel ^b	Description (B-#) ^c	Materials Stored or Released	Dates of Operation	Status	Risk to Human Health and the Environment ^d	Regulatory Mechanism	Recommendation
OUs, and reuse parcels were not established	2	1	UST	No. 2 fuel oil	Until 7/7/86	Removed on 7/7/86. Free product detected in 6/97.	Risk assessment on groundwater has not been performed at this time.	MDE, EPA	Further characterization of the nature and extent of contamination in the groundwater
	5	2	AST (B-7)	Diesel fuel	Until 7/96	Soil samples taken in 6/97. No contamination found. AST is inactive.	None	MDE, EPA	NFA
	3	3	Former MSA	Unknown	Observed in 1944 to 1957, aerial photos	Soil samples taken in 6/97. No contamination found. Paved parking lot.	None	MDE, EPA	NFA
	3	3	Former trenches and mounds	Unknown	Observed in 1944 to 1960, aerial photos*	Soil samples taken in 6/97. No contamination found. Grassy lawn.	None	MDE, EPA	NFA
	3	3	South of Paved Parking Lot (B-1)	Unknown	Observed in 1944 to 1960, aerial photos	Soil samples taken in 6/97. No contamination found. Grassy lawn.	None	MDE, EPA	NFA
	3	3	South of Warehouse (B-2 through B-5)	Unknown	Observed in 1944 to 1960, aerial photos	Soil samples taken in 6/97. No contamination found. Grassy lawn.	None	MDE, EPA	NFA
	4	3	Stained area along property boundary (B-6)	Discharge from adjacent property	Periodic releases	No action. Grassy lawn.	None	MDE, EPA	NFA
	6	3	Background Sample (B-8)	None	NA	NA	NA	MDE, EPA	NFA

^a Task number defined in the ES investigation

^b CERFA Parcel No. defined in Figure 3-3

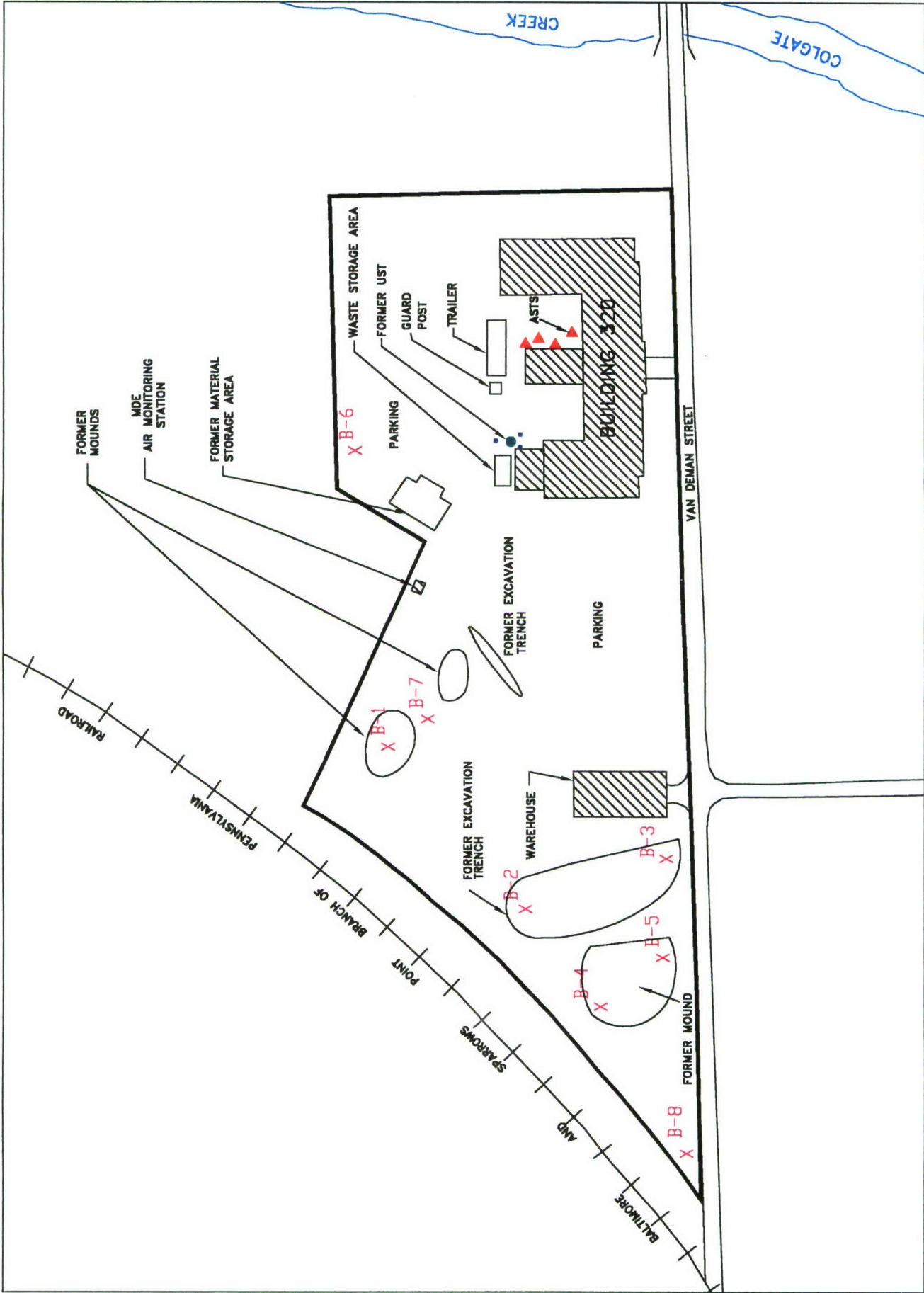
^c See Soil Boring Number on Figure 3-2

^d Based on EPA Region III RBCs

NFA No Further Action
No. Number
OU Operable Unit
CERFA Community Environmental Response Facilitation Act

NA Not Applicable
MSA Material Storage Area

* Source (EPIC, 1990)



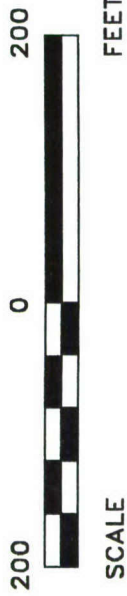
LEGEND

- BUILDING/STRUCTURE
- REMOVED BUILDING/STRUCTURE OR DELINEATED FORMER STORAGE LOCATION
- ROADS, PARKING, ETC, PAVED
- BRAC PROPERTY BOUNDARY
- RAILROAD
- ASTS
- USTS
- MONITORING WELL
- SOIL BORING LOCATION

DEPARTMENT OF THE ARMY

U.S. Army Environmental Center

CONTRACT NO. DACA31-94-D-0084		FIGURE 3-2	
2113 Eisenhower Park, Room 21040 Edgewood, Maryland 21040 (410) 812-8360		FORT HOLABIRD DIS	
PREPARED BY RHC	TASK NO. 66226	REF DWS NO. FHBCP	SAMPLING LOCATIONS
CHECKED BY T. LONGE	DATE 10-25-98		



3.2 COMPLIANCE PROGRAM STATUS

Environmental compliance program records are maintained by the Fort Holabird DIS and by the Fort Meade EMO. Mission- and operational-related projects are those which have been or would be conducted for the normal operation of the installation. These projects are unrelated to activities necessitated by the installation closure under BRAC. General compliance activities address the management of USTs, ASTs, hazardous substances and waste, PCBs, asbestos, lead-based paint (LBP), and water discharges. Examples of hazardous substances used on the installation include developer and fixer, anhydrous ammonia, computer backup batteries, fire extinguishers, air conditioning substances, and refrigerant oil. Compliance programs which were implemented at DIS prior to July 1996 are identified in Table 3-4 and detailed in the following sections.

Table 3-4. Mission/Operational-Related Compliance Projects

Project	Status	Regulatory Programs
USTs	Removal of known UST in 1986 Verification of removal in 1997	MDE, RCRA – Subtitle I
ASTs	Removal of AST underground piping in 1994	MDE, RCRA – Subtitle I
Hazardous Waste Management	Storage and disposal as required	RCRA – Subtitle C
PCBs	No PCB transformers remain on site	TSCA
Asbestos	Abatement in conjunction with normal O&M activities	MDE, OSHA
LBP	Three testing efforts completed	MDE, OSHA

AST Above-ground Storage Tank
 LBP Lead-Based Paint
 MDE Maryland Department of the Environment
 O&M Operations and Maintenance
 OSHA Occupational Safety and Health Administration
 PCB Polychlorinated Biphenyl
 RCRA Resource Conservation and Recovery Act
 TSCA Toxic Substances Control Act
 UST Underground Storage Tank

Closure-related compliance projects are those environmental compliance and restoration activities related to BRAC closure and property disposal. Closure-related compliance projects for Fort Holabird DIS are listed in Table 3-5.

Table 3-5. Closure-Related Compliance Projects

Project	Status	Date	Regulatory Program
BRAC Cleanup Plan, Version I	Draft	September 1996	BRAC
	Final	April 1998	
BRAC Cleanup Plan, Version II	Draft	October 1998	BRAC
	Final	December 1998	
Environmental Baseline Survey	Draft	March 1996	BRAC
	Draft Final	October 1996	
	Final	April 1998	
Environmental Assessment Report	Final	April 1997	NEPA
Project Work Plan	Final	June 1997	BRAC
Environmental Sampling	Draft	October 1997	BRAC

A number of compliance-related activities at Fort Holabird DIS have been completed as part of the installation's compliance program to remove contamination sources and reduce risk posed by releases or potential releases. These actions include asbestos abatement, PCB removal, and UST removal and replacement. These early actions are identified in Table 3-6.

Table 3-6. Compliance Early Action Status

Site Number	Action	Purpose	Status
UST Spill Area	UST was removed on July 7, 1986.	Source removal	NFA
	Four monitoring wells were installed in 1986. Sampling of the monitoring wells continued until February 1988.	Determine level of groundwater contamination	Continued characterization of petroleum contamination in groundwater recommended
AST Spill Area	A 50-foot boom was placed along the embankment of Colgate Creek on March 7, 1994.	Spill cleanup	NFA
	Hand-augured soils samples were taken (1994).	Determine lateral extent of release	NFA
	Contaminated soil was removed according to soil auguring findings in April 1994.	Remove residual contamination	NFA
	Underground lines were replaced with above-ground lines in April 1994.	Source removal	NFA
	Additional soil sampling in June 1997.	Confirmation that contamination no longer exists	NFA
PCB Remediation	Three PCB-containing transformers were replaced in 1991.	Comply with PCB mitigation laws	No PCB transformers remain on the installation.
Asbestos Remediation	Removal of ACM in basement room, and air handling rooms before 1996.	Comply with Federal and U.S. Army regulations	Ongoing – as part of caretaker status maintenance
LBP Remediation	Limited LBP abatement before 1996.	Comply with Federal and U.S. Army regulations	Ongoing – as part of caretaker status maintenance

ACM Asbestos-containing material
NFA No Further Action
PCB Polychlorinated Biphenyl
LBP Lead-Based Paint

3.2.1 Storage Tanks

One UST and four ASTs have been used for the storage of diesel and fuel oil petroleum products at Fort Holabird DIS. The UST has been removed and the ASTs are currently inactive. Compliance activities and environmental restoration activities related to these storage tanks are described in the following subsections.

3.2.1.1 Underground Storage Tanks

The former UST spill area is located about 30 feet from the outside of the boiler room wall near the southwest corner of Building 320. An 8,000-gallon UST was installed in this area around 1952 when Building 320 was constructed. The UST was used to store No. 2 fuel oil for the boiler until 1986 when the boiler was converted to burn propane gas. On March 13, 1986, oil from the UST and its supply line was observed bubbling out of the ground during excavation of water lines. An estimated 10 gallons were released. According to MDE records, the UST was removed on July 7, 1986, and its lines were tested for tightness (MDE, 1992, 1989a,b, Gannett Fleming, 1986). Excavation of the former UST revealed pooled oil in the open pit (DNR, 1986). Large corrosion holes were found in the feed line and on the tank. The feed line also failed the hydraulic test (MDE, 1986a,b,c,d). Table 3-7 lists information about the UST.

Table 3-7. Underground Storage Tank Inventory

Tank No.	Site No. /Parcel	Location	Year Installed	Capacity (gallons)/ Tank Material	Substance Stored	Status	Comments	Future Actions
N/A	N/A	Bldg 320	1952	8,000/Steel	No. 2 Fuel Oil	Removed 7/7/86	Spill occurred on 3/13/86	Sampling of monitoring wells

Bldg Building
N/A Not Applicable

Four monitoring wells were installed: one in the location of the former UST near the west end of the site, the second between the excavation site and the boiler room, the third approximately 25 feet directly west of the excavation site, and the fourth approximately 20 feet directly north of the excavation site. The four wells were bailed on October 28, 1986, by MDE. Two of the monitoring wells were found to contain 10 inches and 1 inch of free petroleum products. Petroleum products were subsequently found in the remaining two of the four monitoring wells. Thereafter, Handex Corporation was contracted by Fort Meade's EMO to gauge and purge the wells of free products as necessary. The Handex monthly gauging consisted only of observation of the presence of free product and its thickness. No analytical results were obtained. The practice was discontinued in February 1988 when free-product was no longer found (Handex, 1984-1988). A letter to MDE from Handex stated that discontinuation of the monthly gauging was requested by the Army and permitted by the State.

The four monitoring wells were also examined by the USACE in July 1997. All four wells were found to contain free petroleum products. Two of the wells were not sampled because they contained too much free phase petroleum products (USACE, 1997a). The USACE recommended in the draft data summary report that a more focused investigation of the contamination in the groundwater and soil be conducted in the UST source area. The investigation should focus on the UST as a source of petroleum hydrocarbon contamination and move outward from this location. The cause for the presence of free product in nearby monitoring wells should be determined.

Additional excavation with a backhoe of the former UST site was conducted in January 1998 to confirm if the tank remained buried at the site. The investigation revealed the existence of a vent pipe along the side of the building. A portion of the black top appeared to have been replaced. The pipe had been cut and only a small section of the line remained. It was confirmed that the UST had been removed (MDE, 1998).

3.2.1.2 Above-ground Storage Tanks

Three ASTs with capacities of 500, 275, and 100 gallons, are located in a bermed area in the northern open space of Building 320. These tanks store diesel fuel for an emergency power generator for facility computers. The tanks were previously connected to underground feeder lines and to a 50-gallon charge AST. Table 3-8 lists the ASTs on site.

Table 3-8. Above-ground Storage Tank Inventory

Tank No.	Location	Year Installed	Capacity (gallons)	Contents	Status
N/A	Bldg 320	Unknown	500	Diesel	Inactive
N/A	Bldg 320	Unknown	275	Diesel	Inactive
N/A	Bldg 320	Unknown	100	Diesel	Inactive
N/A	Bldg 320	Unknown	50	Diesel	Inactive

N/A Not Available

On March 1, 1994, a leak was discovered along the path of the underground lines. The leak infiltrated the grassy area across from the parking lot. On March 7, 1994, the MDE emergency response team was notified following the discovery of an oily sheen in the storm drain located in the rear of the building and on a stream approximately 300 yards from the site. The stream empties into Colgate Creek. A 50-foot boom was placed along the embankment from where the oily product was leaching. The leaking underground lines were excavated and replaced with above-ground piping. The lateral extent of the release was determined by hand-augured soil samples. Soil in the contaminated area was removed to a depth of approximately 18 inches and stockpiled on site (MDE, 1994a,b,c). Analytical testing of the stockpiled soil found no petroleum contamination (C.W. Over, 1994). The soil was then transported to Maryland Clay Products to be manufactured into bricks (Cherokee, 1994a,b). At that time, MDE did not require groundwater monitoring wells to be installed in the area to determine possible impact to groundwater. Although the existing groundwater monitoring wells were tested, nothing was found (Phase Separation, 1994). A clay layer was encountered one foot beneath the surface which implied that contamination would not infiltrate below this level. Cleanup of the site was determined to be complete by the MDE on February 8, 1995 (MDE, 1995).

During the October 1995 site visit, ICF KE staff observed that soil beneath the paved driveway that separates the tanks from the dead grassy area was not sampled after the spill occurred. The path of the underground pipe is along this area and the soil may have been impacted by the spill. The ICF KE staff also noticed oil stains and dead vegetation around the charge tank. This soil has been removed as of September 1996.

In June 1997, sampling of the soil beneath the parking lot between the tank and the downgradient grass was conducted (See Table 3-3). Surface and subsurface soils were found to be free of contamination at levels of concern. Further investigation of these locations does not appear to be necessary.

3.2.2 Hazardous Materials/Waste Management

Hazardous waste compliance programs at Fort Holabird DIS were conducted under the following regulations: AR 200-1; the Federal requirements found in 40 Code of Federal Regulations (CFR) 260 through 269, 40 CFR 117, and 40 CFR 171 et seq.; Department of Transportation (DOT) regulations; and the Maryland hazardous Waste Management regulations. Hazardous wastes generated on site were managed in accordance with all applicable State and Federal regulations.

Permitted activities that were regulated under the provisions of RCRA include storage and use of hazardous substances, and generation, storage, and disposal of hazardous wastes. Hazardous substances used at the Fort Holabird DIS include solvents, petroleum products, flammable liquids, herbicides, pesticides, and other miscellaneous office toners and inks. Records on storage and use of hazardous substances were managed at Fort Meade's EMO.

3.2.2.1 Hazardous Materials Management

Hazardous substances were stored and used in various operations of Building 320. Hazardous substances used at Fort Holabird DIS included developer, fixer, and anhydrous ammonia for microfilm processing; paints for typical building maintenance; batteries as backup power for the computers; propane for the boilers; miscellaneous cleaning supplies; and typical office inks and toners. Most of the substances were purchased in 1 to 5 gallon (gal) containers. Anhydrous ammonia was purchased in two

50-pound (lb) canisters that were centrally connected to four diazo machines. All these items were stored inside Building 320 except when the canisters were relocated to outside the building because of an odor problem.

Halon 1301, an ozone depleting substance, was stored in four 487-lb tanks in the computer room in Building 320 (Room 220) for fire extinguishing. There were three air conditioning units in the computer room, each operated with about 100-lbs of HCFC-22. A chiller also operated with about 100 pounds of HCFC-113.

Four 200-lb barrels, three 100-lb barrels, and two 5 gallon buckets containing approximately 120 gallons of refrigerant oil (CCl_3F) were observed stacked in the corner of the boiler room during the October 1995 site visit. These refrigerant oils were accumulated over 5 years (Fort Holabird, 1996). The waste containers were not properly labeled, and were located in an area not equipped with spill containment and adjacent to a floor drain. These containers of refrigerant oil were relocated to Fort Meade in September 1996 for disposal through Fort Meade's contractors. There is no information to suggest that spills or releases of hazardous substances occurred at this location.

An unmarked 55-gallon drum, which was bulging at the bottom, was observed outside the southwest side of the building next to the chimney. The barrel had been there for several years. The 55-gallon drum was opened and disposed of in July 1996. The drum contents appeared to be water, food, and grease presumed to have originated from an on-site cafeteria. The drum was shipped from the site by the contractor, Valley Protein, to an appropriate facility in July 1996.

Fuel oils were stored in ASTs outside and were regularly refilled. Paints, gasoline, oil, hydraulic fluid, toners, and insecticides were stored in the warehouse in small quantities for normal operations and maintenance usage. Pesticides, herbicides, fungicides, insecticides, and rodenticides were used according to label instructions and not in quantities in excess of routine usage. Storage and use of hazardous substances are summarized in Table 1-5.

3.2.2.2 Hazardous Waste Management

Given the nature of activities at Fort Holabird DIS, hazardous substances were produced in small quantities, so no RCRA permits were required. Spent chemical solutions used in photographic processing were discharged down the drain into the municipal sanitary sewer system as allowed in a sub-permit with Baltimore City. Photographic fluid containers entered the MSW stream. Spent anhydrous ammonia containers were returned to the supplier where they were refilled. Inks and toners were used and the spent containers were recycled through the supplier, or disposed of through the MSW stream. Fire extinguishers (Halon 1301) were removed and sent back to the supplier. Refrigerants were consumed. Paints and insecticides were used and then disposed of through the MSW stream. Gasoline, oil and hydraulic fluid stored in the warehouse were used. The stored amounts were removed from the warehouse by the general site maintenance contractors in July 1996 when the DIS relocated its operations to Linthicum, MD. The backup power batteries for the computers were also moved to the new location.

3.2.3 Solid Waste Management

Documentation is not available detailing the MSW stream. However, it is assumed that normal disposal occurred in on-site dumpsters which were removed by refuse contractors. Dumpsters were located in the waste storage area on the southwest side of the building shown in Figure 1-2.

3.2.4 Polychlorinated Biphenyls

The PCB management compliance programs at Fort Holabird DIS are conducted under AR 200-1, Federal requirements found in 40 CFR 761, and DOT regulations. One indoor transformer located in the basement and three outdoor transformers located on a concrete pad were determined to be PCB-contaminated and were removed from the site in 1991.

In February 1991, seven wipe samples from the indoor vault and three wipe samples, four soil samples, and three oil samples from the outdoor transformers were taken for PCB analysis. The three oil samples from the outdoor transformers indicated that these transformers are PCB-contaminated (50-499

ppm). The three transformers were drained of the PCB-contaminated fluid and the drained fluid and the transformers were removed from the site in April and May 1991 (Meyers, 1991). The hazardous waste materials were properly manifested (MET, 1991a,b,c, MDE 1991,a,b,c,d).

The outdoor concrete pad was required to be cleaned to less than 10 $\mu\text{g}/100\text{ cm}^2$. Wipe samples from the outdoor concrete pad confirmed that it was clean. Contaminated soil was required to be excavated to a point where the PCB concentration was 10 ppm or less. Soil samples from the outdoor substation also indicated the soil to be clean.

The floor of the basement transformer room was required to be cleaned to below 10 $\mu\text{g}/100\text{ cm}^2$, or it could be cleaned to below 100 $\mu\text{g}/100\text{ cm}^2$ and then encapsulated with an epoxy paint. Although attempt was made to clean the floor to within the above standards, additional hazardous conditions prompted further actions. Flooding in a high voltage switch gear area and the presence of a floor drain led to the decision to remove and replace 200 cubic feet of the concrete floor, and also encapsulate it with epoxy paint. This was performed by Statewide construction in May 1991 (Statewide Construction, 1991). A new switch gear was installed as part of the work.

3.2.5 Asbestos

Asbestos-containing material (ACM) is regulated by USEPA, the Occupational Safety and Health Administration (OSHA), and MDE. Asbestos at Fort Holabird DIS is managed in compliance with the U.S. Army guidance "Lead-Based Paint and Asbestos in U.S. Army Properties Affected by Base Realignment and Closure."

An asbestos survey conducted in limited areas of Building 320 between 1985 and 1987 confirmed the presence of ACMs in the building. The ACMs found in the insulation of some of the air handling rooms have been removed. An internal environmental study conducted in 1991 also found ACMs in floor tiles. In 1992, the chiller room and the boiler room were tested for ACMs prior to repair work on the chiller, and no asbestos was found to be present. Neither the 1985-1987 asbestos survey, nor the 1991 internal environmental study was available for review because they could not be found. The EA Report (USACE, 1997c) states that all friable asbestos has been removed from the DIS.

3.2.6 Radon

The radon reduction program at Fort Holabird DIS is conducted under AR 200-1, Chapter 11, U.S. Army Radon Reduction Program. The Department of the Army has adopted EPA's recommended remedial action level as its indoor radon standard. Levels of radon exceeding 4 picocuries per liter of air require mitigation. Radon monitoring was conducted as part of an internal environmental study in 1991. However, ICF KE was unable to obtain written documentation of this effort and any further information such as location and radon levels was unavailable.

3.2.7 RCRA Facilities (Solid Waste Management Units)

Permitted activities that are regulated under the provisions of RCRA include storing and using hazardous substances and generating, storing and disposing of hazardous wastes. Hazardous substances used in small quantities at the DIS including solvents, petroleum products, flammable liquids, herbicides, pesticides, and miscellaneous office toners and inks did not require a RCRA permit. The DIS obtained temporary permits for hazardous waste disposal, as needed. No solid waste management units (SWMUs) were identified for the site.

3.2.8 National Pollutant Discharge Elimination System Permits

Building 320 at Fort Holabird DIS has always been serviced by the City of Baltimore municipal sanitary sewer system. Wastewater from Building 320 consists of typical effluent from toilets and sinks except for small amounts of spent developing solutions from microfilm processing operations.

Stormwater from the parking lot and the rest of the site is discharged through an underground stormwater drainage system to Colgate Creek which is located north of Fort Holabird DIS. The installation does not require a stormwater permit (ICF KE, 1995a, Fort Holabird, 1996).

3.2.9 Oil/Water Separators

No oil/water separators exist on the Fort Holabird DIS property.

3.2.10 Lead-Based Paint

A lead-based paint (LBP) survey has been conducted for Building 320; however, the results are unavailable for review because the document cannot be located. Lead-based paint is expected to be present in the building because it was built before 1978. The storage warehouse, the trailer and the guardpost are not expected to have LBP because they were built after 1978. No abatement has been performed except some limited removal in the boiler room during the removal of a PCB-containing transformer in 1991.

3.2.11 Unexploded Ordnance

No mission practices at Fort Holabird DIS have ever been identified which would cause the existence of UXO on the property.

3.2.12 Nuclear Regulatory Commission Licensing

There is no evidence that suggests the presence or past usage of any radioactive materials on the Fort Holabird DIS property.

3.2.13 Pollution Prevention

Pollution prevention at Fort Holabird DIS was managed in accordance with Chapter 6 of AR 200-1 and applicable Federal and State regulatory requirements. Pollution prevention activities included waste minimization and recycling, and were implemented until the installation moved its operations in July 1996.

3.2.14 National Environmental Policy Act

An EA report was prepared in April 1997 as part of the NEPA documentation process (USACE, 1997c). Information for this BCP was obtained from the EA report.

3.2.15 Air Permits

Fort Holabird DIS had permits for two burners each of which has a power capacity of 2.2 MBTU/hr. The burners used No. 2 fuel oil until 1985 when the fuel was converted to propane gas. Other sources of air emissions at Fort Holabird included refrigerants, coolants, and microfilm processors. These sources did not require air permits.

Fort Holabird DIS is located in a highly industrialized area. At least one neighboring industry, Red Star Yeast, is a significant source of local air pollution. Currently, MDE has an air monitoring station located on site to record air emissions in the area.

3.3 STATUS OF NATURAL AND CULTURAL RESOURCES PROGRAMS

This section presents the current status of the natural and cultural resources programs at Fort Holabird DIS. These programs include the identification and management of sensitive environments; vegetation wildlife; wetlands; rare, threatened, and endangered species; and cultural resources. Natural and cultural resources at Fort Holabird DIS are managed in accordance with AR 420-74 and 420-40, DoD Directive 4700.4 and 4710.1, and applicable Federal and State regulations and statutes.

The area surrounding Fort Holabird consists primarily of paved surfaces with industrial, residential, and commercial usages. There are very few natural and cultural resources on the property. A limited number of ornamental trees, shrubs, and turf grasses exist in the surrounding area. The floral and faunal species are typical of highly disturbed urban and industrial environments. Empty buildings may provide habitat for rodents, bats, and pigeons, however, the lack of tree cover limits the number of these species. No endangered species are known to inhabit the property.

The Baltimore Chesapeake Bay Critical Area Program requires a 1,000-foot side buffer around all tidal creeks, wetlands, and waterways. Although Fort Holabird DIS does not contain any wetlands and is not in an established floodplain area, the 1,000-foot wide buffer for Colgate Creek extends onto the property. The property is subject to city zoning regulations governing permitted land uses in the critical overlay areas (USACE, 1997c).

Consultants with the Maryland Historical Trust determined in 1989 that no previously discovered archaeological sites were known for Fort Holabird (USACE, 1997c). There are no archaeological sites, significant cultural resources, cemeteries, burial grounds, historic/architectural investigations or National Register sites identified on, or associated with, the Fort Holabird DIS property (USACE, 1991).

3.4 ENVIRONMENTAL CONDITION OF PROPERTY

In October 1992, Public Law 102-426 (CERFA) amended Section 120(h) of CERCLA and established new requirements with respect to contamination assessment, cleanup, and regulatory agency notification/concurrence for Federal facility closures. CERFA requires the Federal government, prior to termination of Federal activities, to identify property where no hazardous substances were released or disposed. The primary objective of CERFA is for Federal agencies to expeditiously identify real property offering the greatest opportunity for immediate reuse and redevelopment. Although CERFA does not mandate the U.S. Army to transfer real property so identified, the first step in satisfying the objective is the requirement to identify real property where no CERCLA-regulated hazardous substances or petroleum products were released or disposed.

The environmental condition of the Fort Holabird DIS property is provided in Figure 3-3. This map is based on the CERFA Letter Report (ICF KE, 1998). Fort Holabird DIS was parcelized based on seven categories of environmental condition (DoD, 1993a, 1996). The following subsections describe each category. The eighth subsection lists parcels which are suitable for transfer. The parcels presented in Figure 3-3 are described in Table 3-9. Changes were made to the original CERFA parcels based on sampling which was conducted in June 1997. Parcels which were designated as category 7, former mounds and trenches, have been changed to category 1.

3.4.1 Category 1: Areas Where No Release or Disposal (Including Migration) of Hazardous Substances or Petroleum Products Has Occurred

This area type is defined as a geographically contiguous and mappable area where the results of investigations show that no hazardous substances or petroleum products were released into the environment or site structures, or disposed of on site property (including no migration of these substances from adjacent areas). This area type is color-coded white in Figure 3-3.

3.4.2 Category 2: Areas Where Only Release or Disposal of Petroleum Products Has Occurred

This area type is defined as a geographically contiguous and mappable area where the results of investigations show only the release or disposal of petroleum products has occurred. This area type is color-coded blue in Figure 3-3.

3.4.3 Category 3: Areas Where Release, Disposal, and/or Migration of Hazardous Substances Have Occurred but Require No Remedial Action

This area type is defined as a geographically contiguous and mappable area where environmental evidence demonstrates that hazardous substances have been released or disposed, but are present at concentrations that require no response action to protect human health and the environment. There are no category 3 areas at Fort Holabird DIS.

3.4.4 Category 4: Areas Where Release, Disposal, and/or Migration of Hazardous Substances Have Occurred and All Remedial Actions Have Been Taken

This area type is defined as a geographically contiguous and mappable area where all RAs necessary to protect human health and the environment have been conducted to meet the provision of CERCLA section 120(h)(3). There are no category 4 areas at Fort Holabird DIS.

PARCEL CATEGORIES*

CATEGORY COLOR DEFINITION

- 1

White

Areas where no release or disposal of hazardous substances or petroleum products has occurred.
- 2**

Blue

Areas where only release or disposal of petroleum products has occurred.
- 3

Lt. Green

Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- 4

Dk. Green

Areas where release, disposal, and/or migration of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken.
- 5

Yellow

Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are under way, but all required remedial actions have not yet been taken.
- 6

Red

Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
- 7

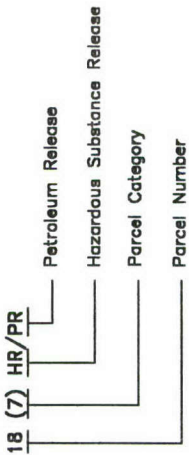
Gray

Areas that are not evaluated or require additional evaluation

*CERFA Parcel Categories reflect the September 1996 Addendum to the Fall 1995 BRAC Guidance.

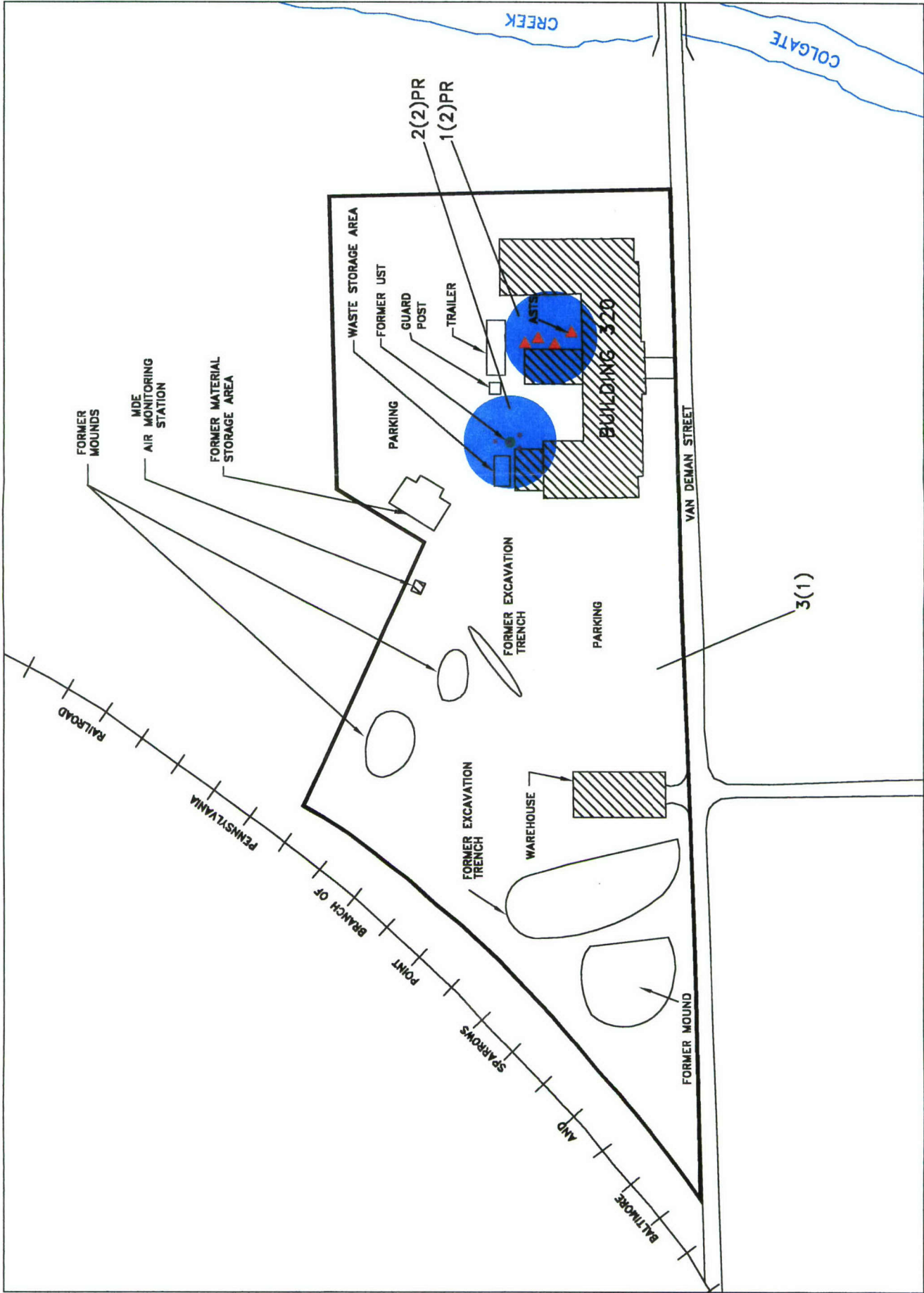
**Release from a UST or AST is indicated by a 0.25-acre diameter circle around the tank

PARCEL LABEL DEFINITIONS



LEGEND

- BUILDING/STRUCTURE
- REMOVED BUILDING/STRUCTURE OR DELINEATED FORMER STORAGE LOCATION
- ROADS, PARKING, ETC, PAVED
- BRAC PROPERTY BOUNDARY
- RAILROAD
- ASTS
- USTS
- MONITORING WELL



SCALE FEET

DEPARTMENT OF THE ARMY

U.S. Army Environmental Center

CONTRACT NO. DACA31-94-D-0084

FIGURE 3-3
FORT HOAGLAND DS

2113 Emmerston Park Road
Edgewood, Maryland 21040
(410) 812-8350

CERFA PARCEL
DESIGNATION MAP

PREPARED BY: JBC
CHECKED BY: T. LONGE
DATE: 10-25-88

TAKE NO: 66226
ICF DWS NO: FHBCP3-2

Table 3-9. CERFA Parcel Descriptions

Parcel No.	Description	Color
1(2)PR	Former UST Spill Area	Blue
2(2)PR	AST Spill Area	Blue
3(1)	Building 320, Warehouse, Guard Post, Trailer, and Parking Lot, Former mounds and excavation trench.	White

3.4.5 Category 5: Areas Where Release, Disposal and/or Migration of Hazardous Substances Have Occurred and Action is Underway but Not Final

This area type is defined as a geographically contiguous and mappable area where the presence of sources or releases of hazardous substances is confirmed. This is based on the results of sampling and analysis available in electronic databases and/or environmental restoration and compliance reports. There are no category 5 areas at Fort Holabird DIS.

3.4.6 Category 6: Areas Where Release, Disposal, and/or Migration of Hazardous Substances Has Occurred, but Required Response Actions Have Not Been Taken

This area type is defined as a geographically contiguous and mappable area where the presence of sources or releases of hazardous substances is confirmed. This is based on the results of sampling and analysis as contained in electronic databases and/or environmental restoration and compliance reports. There are no category 6 areas at Fort Holabird DIS.

3.4.7 Category 7: Areas Not Evaluated or Require Additional Evaluation

This area type is defined as a geographically contiguous and mappable area where the presence of sources or releases of hazardous substances or petroleum products (including derivatives) is suspected, but not well characterized. This is based on the results of a properly scoped records search, chain of title review, aerial photography review (National Aerial Resources, 1990, 1995), visual inspection, set of employee interviews, and possibly sampling and analysis. Previously identified category 7 areas were color coded gray in Figure 3-3. They have since been eliminated based on the ES report. However, further characterization of groundwater in the vicinity of the former UST is recommended (USACE, 1997c).

3.4.8 Suitability of Installation Property for Transfer by Deed

SARA Title I, Section 120 of CERCLA, requires that any deed for transferred federal property on which any hazardous substance was stored for one year or more, known to have been released, or known to have been disposed of, contain, to the extent that such information is available based on a complete search of agency files, the following information:

- A notice of the type and quantity of such hazardous substances;
- A notice of the time at which such storage, release, or disposal took place;
- A description of the RA taken, if any; and
- A covenant warranting that all RAs necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken before the date of such transfer, and any additional RAs found to be necessary after the date of such transfer shall be conducted.

The U.S. Army has begun the identification of property suitable for transfer under CERCLA through the CERFA identification process. The CERFA process is a screening mechanism to identify those properties immediately transferable. Figure 3-4 identifies the parcels at Fort Holabird DIS that are immediately transferable. This property has had no activities which could potentially preclude it from transfer under CERCLA. Data from the environmental sampling conducted in 1997 (USACE, 1997a) indicate that all areas outside of the vicinity of the UST have no residual contamination which would

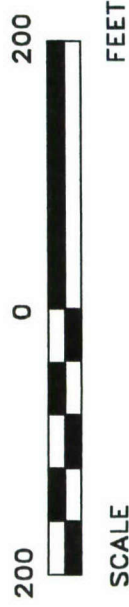
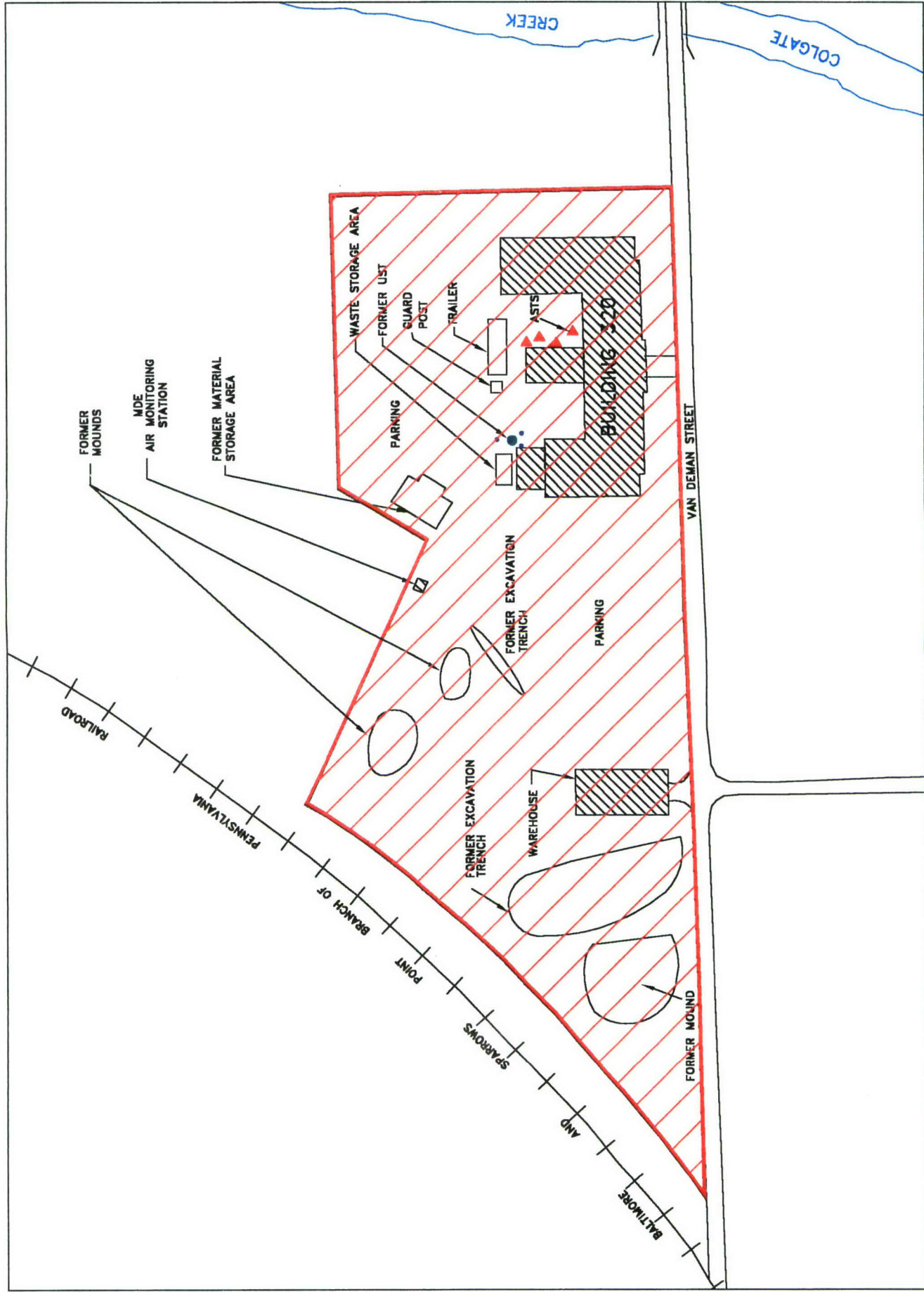
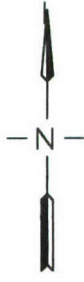
prevent it from being immediately transferable for industrial usages. According to CERFA regulation, category 2 parcels in the vicinity of the UST and ASTs where only release of petroleum products has occurred, does not inhibit the parcels from being transferable. Therefore, the entire site is considered suitable for transfer.

3.5 STATUS OF COMMUNITY INVOLVEMENT

A notice of intent (NOI) to prepare an EA for the disposal of Fort Holabird was published in the Federal Register on September 22, 1995. In April 1996, the Department of the Army initiated coordination with potentially interested agencies, persons, and organizations to solicit their comments and concerns. Formal coordination with the U.S. Fish and Wildlife Service and the Maryland State Historic Preservation Officer has been completed. The EA Report, which contains general plans for disposal and reuse of the property, was issued by the U.S. Army Corps of Engineers in April 1997 (USACE, 1997c). The Mayor of Baltimore designated the BDC, the City's economic development agency, and the Holabird Working Group, a committee consisting of businesses and community representatives, as the Local Redevelopment Authority (LRA) which has been meeting since 1995. A Reuse Plan was issued by the BDC, representing the LRA, in August 1997. The LRA's recommendations for reuse are consistent with the current usages in the Holabird Industrial Park, existing zoning laws, and the identified needs of the area (BDC, 1997).

Community relations activities that may take place at Fort Holabird DIS from time to time include the following:

- Federal Facility Agreement (FFA) Process;
- Information Repositories;
- Administrative Record;
- Community Relations Plan;
- Restoration Advisory Board;
- Technical Assistance Grant;
- Mailing List;
- Fact Sheets;
- Open Houses; and
- Proposed Plan Hearings.



DEPARTMENT OF THE ARMY		U.S. Army Environmental Center	
CONTRACT NO. DACA31-94-D-0084	2113 Emmerton Park Road Edgewood, Maryland 21040 (410) 812-3350	FIGURE 3-4 FORT HOLABIRD DIS	AREAS SUITABLE FOR TRANSFER
PREPARED T. LONGE	DATE 10-25-98	TASK NO. 66226	ICF WPA NS FHBCP



4.0 INSTALLATION-WIDE STRATEGY FOR ENVIRONMENTAL RESTORATION

This section describes and summarizes the installation-wide environmental restoration and compliance strategy for Fort Holabird DIS. With the closure announcement, the installation's strategy shifted from supporting an active U.S. Army mission to responding to disposal and reuse considerations. Accordingly, an EBS was conducted in 1995. A sampling and analysis recommendation (SAR) was also developed for areas that require additional information. The site tenant moved operations to Linthicum, MD in July 1996. Environmental sampling was performed in June 1997 to investigate the areas identified in the EBS as requiring additional information. Only one environmental concern remains: groundwater contamination in the vicinity of the former UST. The BCT will develop a comprehensive strategy to address this issue.

4.1 ZONE/OPERABLE UNIT DESIGNATION AND STRATEGY

Zones are defined as geographically contiguous areas amenable to management as a single investigative unit. They are tools for organizing and defining areas of investigation. Zones can be used to group multiple sites and environmental data collected during one or more investigations into related geographic areas for detailed mapping, and to facilitate the development of conceptual models or sources, migration pathways, and receptors. Zones are distinct from operable unit (OU) response actions.

Operable units define an installation's remedial strategy. They are derived from an evaluation of hydrogeologic and chemical analytical data within an investigative zone, or by comparing data between zones. Operable unit types may be based on geographic area, common media (soil, groundwater, surface water, etc.), common treatment technology, priorities, or schedules. Operable units establish a logical sequence of discussions that address contamination releases in a comprehensive fashion.

4.1.1 Zone Designations

In response to U.S. Army base closure environmental restoration goals, restoration sites requiring further action at Fort Holabird DIS may be grouped into zones as defined above. Conceptual models of sources, contaminant migration, and receptors developed for these zones can provide a basis for defining a comprehensive OU strategy.

4.1.2 Operable Unit Designations

Operable units are defined as discrete response actions or steps toward comprehensive environmental restoration and may be further subdivided or integrated where conceptual models of sources, contaminant migration, and receptors indicate the need for delineation of source-control and groundwater response actions. Operable units are not necessarily equivalent to zones. Table 4-1 will depict the relationships between OUs, zones, CERFA parcels, and site descriptions.

Table 4-1. Relationship Between Operable Units, Zones, Parcels, and Sites

Operable Unit	Zone	CERFA Parcel	Site Description
Operable units and zones have not been established for Fort Holabird DIS nor has it been parcelized for reuse and disposal yet. Future changes will be reflected here.			

4.1.3 Sequence of Operable Units

A comprehensive OU strategy will be developed by the Fort Holabird DIS BCT. The strategy will consolidate restoration sites into zones for investigation, and then define a logical sequence of OUs addressing all past releases associated with these sites. The site cleanup sequence at Fort Holabird DIS will be summarized in Table 4-2. Figure 4-1 will identify the timeline for generation of primary documents necessary to complete site cleanup actions. The schedule will be developed using a critical path analysis method.

Table 4-2. Cleanup Sequence

Reuse Parcel	Site	Environmental Risk	Reuse Priority	Cleanup Sequence	Reconcile Comments
The cleanup sequence at Fort Holabird DIS has not been established at this time. Future changes will be reflected here.					

4.1.4 Environmental Early Actions Strategy

The BCT will identify early actions that would accelerate cleanup activities. Information of additional removal actions, interim remedial actions, or treatability studies will be provided by the BCT. Table 4-3 will identify the planned early restoration actions for Fort Holabird DIS.

Table 4-3. Environmental Restoration Planned Early Actions

Site	Action	Objective	Time Frame
Restoration early actions have not been identified for Fort Holabird DIS. Future changes will be reflected here.			

4.1.5 Remedy Selection Approach

Remedies will be selected for the appropriate OUs after adequate characterization of the nature and extent of contamination has been completed. The remedies will be selected in accordance with statutory and National Oil and Hazardous Substance Pollution Contingency Plan (NCP) criteria. The Fort Holabird DIS BCT will involve all parties, who have an impact on the actions selected at the installation, in the remedy selection process. Particular attention will be given to the following during the evaluation of alternatives:

- **Applicable or Relevant and Appropriate Requirements (ARARs).** Applicable requirements for anticipated RAs will be identified by the BCT. The effectiveness of alternatives in reducing concentrations of contaminants below chemical-specific ARARs will be evaluated. Waivers will be considered where treatment to standards is technically impractical;
- **Land Use/Risk Assessment.** Risk assessment protocols will incorporate future land use in exposure scenarios;
- **Applicable Remedies.** The presumptive remedy selection approach advocated in USEPA's 30-day study will be applied in selected cases. Focused Feasibility Studies (FFS) will be developed where appropriate; and
- **Future Land Use.** Cleanup goals need to be factored into future land use and/or deed restrictions.

The BEC will hold Project Team meetings to discuss conceptual remedies early in the FS process during the initial screening of alternatives (ISA) stage to ensure the FS focuses on the appropriate types of remedies for each site or OU.

The sequence and timelines for OUs have not been determined at this time. OUs have not been identified at this time. Future changes will be reflected here.					
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Figure 4-1. Sequence and Primary Document Timeline for Operable Units

4.2 COMPLIANCE STRATEGY

This section describes the strategies for addressing compliance-related environmental issues at Fort Holabird DIS prior to closure and/or property transfer. These environmental compliance strategies have been developed to ensure that installations are compliant with Federal and State regulatory programs, as well as DoD and U.S. Army directives and regulations throughout the BRAC process. There are no environmental compliance early actions planned for Fort Holabird DIS at this time, and future compliance issues are not anticipated. Environmental compliance planned early actions are listed in Table 4-4.

Table 4-4. Environmental Compliance Planned Early Actions

Site	Action	Objective	Time Frame
Compliance early actions have not been identified for Fort Holabird DIS. Future compliance issues are not anticipated.			

4.2.1 Storage Tanks

One UST was removed in 1986 and no known USTs are currently in operation at Fort Holabird DIS. Four monitoring wells were installed at the time and free product bailed until none remained in the wells. The underground lines leading to the four ASTs currently on site were removed and replaced with above-ground lines. Analytical tests of samples from three of the monitoring wells installed at the time of the UST removal, revealed no hydrocarbon contamination. Analytical testing was also conducted for the stockpiled soil excavated from the grassy area around the leaking underground lines leading to the AST before proper removal from the site. The stained soil observed around the 50-gallon diesel day tank during the 1995 site visit has been removed as of September 1996. Management of these ASTs continued to meet all Federal and State regulations until DIS operations were moved in July 1996.

4.2.2 Hazardous Materials/Waste Management

Limited quantities of chemical solutions used in photographic processing continued to be disposed of in the sanitary sewer system until operations ceased in July 1996.

4.2.3 Solid Waste Management

Non-hazardous solid wastes were hauled by contractors and disposed of off site in a State-sanctioned landfill and/or recycled until operations ceased in July 1996.

4.2.4 Polychlorinated Biphenyls

Four transformers found to be PCB-contaminated were removed from the site in April and May 1991. All transformers at Fort Holabird DIS are PCB-free.

4.2.5 Asbestos

Asbestos management continued as needed until operations ceased in July 1996. All friable ACM was removed in Building 320 (USACE, 1997c).

4.2.6 Radon

Testing efforts and information about radon on the Fort Holabird DIS property are not available at this time. Corrective actions would have been implemented had the results of the radon testing revealed non-acceptable levels in Building 320.

4.2.7 RCRA Facilities

Fort Holabird DIS does not have any RCRA permitted facilities.

4.2.8 NPDES Permits

National pollutant discharge elimination system (NPDES) permits are not required at Fort Holabird DIS.

4.2.9 Oil/Water Separators

No oil/water separators exist on the Fort Holabird DIS property; therefore, there are no compliance requirements or strategies for this program.

4.2.10 Lead-Based Paint

A lead-based paint (LBP) survey has been conducted for Building 320; however, the results were unavailable for review because the document cannot be located. Lead-based paint is expected to be present in the building because it was built before 1978. The storage warehouse, the trailer and the guardpost are not expected to have LBP because they were built after 1978. No abatement has been performed except some limited removal in the boiler room during the removal of a PCB-containing transformer in 1991.

4.2.11 Unexploded Ordnance

No mission practices at Fort Holabird DIS have ever been identified which would cause the existence of UXO on the property; therefore, there are no compliance requirements or strategies for this program.

4.2.12 NRC Licensing

There were no Nuclear Regulatory Commission (NRC) licenses for Fort Holabird DIS; therefore, there are no compliance requirements or strategies for this program.

4.2.13 Pollution Prevention

Fort Holabird DIS continued to practice pollution prevention until closure in July 1996.

4.2.14 Mixed Waste

Mixed waste was not generated at Fort Holabird DIS; therefore, there are no compliance requirements or strategies for this program.

4.2.15 Radiation

There were no radiation compliance issues at Fort Holabird DIS; therefore, there are no compliance requirements or strategies for this program.

4.2.16 National Environmental Policy Act

An Environmental Impact Statement (EIS) for the transfer of Fort Holabird DIS has been prepared in the form of the EA report. Additional information on NEPA documentation will be provided by the BCT, as necessary.

4.2.17 Medical Waste

Medical waste was not generated by Fort Holabird DIS; therefore, there are no compliance requirements or strategies for this program.

4.2.18 Air Permits

Fort Holabird DIS property has two permitted burners (MDE, 1977). Fort Holabird DIS continues to comply with applicable air requirements and regulations. The MDE continues to operate the air monitoring station on the property.

4.3 NATURAL AND CULTURAL RESOURCES STRATEGIES

Due to the industrial nature of Fort Holabird DIS and its surroundings, there are little-to-no sensitive resources remaining in the area. Current practices with regard to preserving the natural environment of Fort Holabird DIS will continue. It is not necessary to develop strategies for natural and cultural resource programs at Fort Holabird DIS to manage these resources throughout the BRAC cleanup and installation closure process.

4.3.1 Other Resources

At this time, no other natural or cultural resources have been identified at Fort Holabird DIS.

4.4 COMMUNITY INVOLVEMENT/STRATEGY

A Community Relations Plan (CRP) would help facilitate communication among the U.S. Army, other Federal, State, or local agencies, and interested groups and other community residents concerning restoration activities at Fort Holabird DIS. This communication would ensure that all parties involved or interested are provided accurate, consistent information in a timely manner concerning related cleanup activities, contaminants, and possible effects of any contamination. It would provide mechanisms for all parties to provide input into the decision-making process of the environmental restoration program.

The Department of the Army will notify the public and concerned organizations of the conclusion of the EA by publishing the Finding of No Significant Impact in a local newspaper and making the EA available for review for at least 30 days prior to initiating the actions. The Fort Meade Public Affairs Office will keep the public informed on the status and progress of the proposed action (USACE, 1997c). A schedule for community as well as environmental activities associated with the proposed action is provided in Figure 5-1.

Additional strategies to support a proactive community relations program in accordance with the CERCLA requirements include:

- Develop a CRP;
- Develop Proposed Plans (PPs) and issue PP fact sheets. Issue public notice two weeks in advance of public comment periods on these plans in local newspapers;
- Hold 30-day public comment periods on PPs, and respond to all comments in a responsiveness summary;
- Hold regular Restoration Advisory Board (RAB) and NEPA meetings;
- Hold informal and formal public meetings as required during the response process;
- Provide an opportunity for public comment on removal actions;
- Maintain an information repository at the installation; and
- Publish facts sheets on the progress of environmental restoration and disposal programs.

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5.0 ENVIRONMENTAL PROGRAM MASTER SCHEDULES

This section is devoted to Master Schedules of anticipated activities in Fort Holabird DIS's environmental programs, which include the following: environmental restoration activities, compliance activities, and natural and cultural resources activities. These schedules are developed from detailed network and operational schedules prepared to support site-specific work plans and compliance agreements. Each of these schedules display the critical path analysis for the respective installation program. At the moment, only one master schedule was prepared for community involvement activities, environmental restoration activities, compliance activities, natural and cultural resources at Fort Holabird DIS, and transfer plans (See Figure 5-1).

5.1 ENVIRONMENTAL RESTORATION PROGRAM

This section presents response schedules and outlines fiscal year requirements for Fort Holabird DIS's environmental restoration program.

5.1.1 Response Schedules

The schedule for environmental response actions for Fort Holabird DIS is detailed in Figure 5-1. The installation's ability to meet the milestones of the schedule hinges on (1) the preparation of draft reports and baseline risk assessments (i.e., not impeded by discovery of additional sources), and (2) expedited review of submitted documents. The following actions will be taken by the BCT to expedite the schedule:

- Draft documents will be reviewed in a timely fashion;
- Documents will be revised for quick turnaround; and
- Concerted effort to obtain missing or unknown information will be expedited.

5.1.2 Funding Requirements by Fiscal Year

The detailed funding requirements information by fiscal year (FY) for projected environmental restoration programs are not available at this time. The information will be presented in Appendix A-1 when available.

5.2 COMPLIANCE PROGRAMS

This section presents master compliance schedules and outlines FY requirements for Fort Holabird DIS's environmental compliance programs.

5.2.1 Master Compliance Schedules

There are no mission/operational-related compliance programs or closure-related compliance programs for Fort Holabird DIS. Therefore, there are no compliance schedules for these programs. If necessary, they will be provided as Figure 5-2 and Figure 5-3, respectively in future revisions.

5.2.2 Funding Requirements by Fiscal Year

The detailed funding requirements information by FY for projected environmental compliance programs is not available at this time, and will be presented in Appendix A-2 in future revisions to the BCP should the information become available.

5.3 NATURAL AND CULTURAL RESOURCES PROGRAMS

This section presents master natural and cultural resources activity schedules and outlines FY requirements for Fort Holabird DIS's natural and cultural resources programs.

Figure 5-1. Fort Holabird DIS Disposal Process

Activity	1995				1996				1997				1998			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
PREPARATION OF EA																
Environmental Assessment																
Finding of No Significant Impact																
Initiate Action																TBD
HAZARDOUS AND TOXIC WASTE INVESTIGATION REMEDIATION																
Enhanced Preliminary Assessment																
Environmental Baseline Survey																
Environmental Sampling																
FOST																
REAL ESTATE DISPOSAL																
Screen with DOD Agencies																
Screen with other Federal Agencies																
Screen with State and Local Agencies																
Dispose of Property																
CULTURAL RESOURCES																
Section 106 Consultation																
BIOLOGICAL CONSIDERATIONS																
Section 7 Coordination																
TRANSFER OF OPERATIONS																

df draft final

Source (USACE, 1997c)

A mission/operational-related compliance schedule is no longer applicable to Fort Holabird DIS.
All operations were relocated to Linthicum, MD in July 1996.

Figure 5-2. Projected Master Schedule for Mission/Operational-Related Compliance Programs

There are no anticipated closure-related activities for Fort Holabird DIS.

Figure 5-3. Projected Master Schedule for Closure-Related Compliance Programs

There are no natural and cultural resources at Fort Holabird DIS.

Figure 5-4. Projected Schedule for Natural Cultural Resources Activities

5.3.1 Natural and Cultural Resources Schedule

There are no natural and cultural resources programs for Fort Holabird DIS. If necessary, they will be provided as Figure 5-4.

5.3.2 Funding Requirements by Fiscal Year

The detailed funding requirements information by FY for projected cultural and natural resources are not available at this time. The information will be presented in Appendix A-3 when available.

5.4 BCT/PROJECT MEETING SCHEDULE

Meetings are planned to promote an expedited restoration schedule for base closure or realignment sites. Meetings are scheduled as required by the applicable process and are typically held as follows:

- BCT Meetings - monthly or as needed;
- Document Presentation Meetings - within 10 days of document submittal;
- Technical/Issue Resolution Meetings - as necessary to facilitate continued movement of the restoration program or compliance activities;
- Restoration Advisory Board - monthly or as needed; and
- BRAC In-Progress Review Meetings - weekly, monthly or as necessary.

There are currently no scheduled meetings for Fort Holabird DIS. If necessary, it will be provided in Table 5-1.

Table 5-1. BCT Meeting Schedule

Date/Frequency	Topic
Information regarding the BCT meeting schedule is not available at this time.	

6.0 TECHNICAL AND OTHER ISSUES TO BE RESOLVED

This chapter summarizes technical and other issues that are yet to be resolved. These issues include information management; the usability of historical data; data gaps; natural (background) levels of elements and compounds in soil, groundwater, surface water, and sediment; risk assessment; State cleanup standards; and program initiatives to complete cleanup requirements as required to meet property transfer schedules. Information pertaining to these issues at Fort Holabird DIS is not available at this time.

6.1 DATA USABILITY

This section summarizes issues that need to be resolved with regard to managing information gathered and used in the base environmental restoration and compliance programs.

6.1.1 BCT Action Items

Future action items may focus on improving coordination of, access to, and management of environmental restoration and real estate-type data generated at Fort Holabird DIS.

6.1.2 Rationale

As the number of agencies and contractors associated with the Fort Holabird DIS disposal and environmental restoration program grows, it will be important that all parties involved be able to share data for decision making. The establishment and maintenance of an electronic database of sampling and analysis data and spatial data (e.g. real estate maps) is the most efficient method of sharing data among parties.

6.1.3 Status/Strategy

Strategies have been developed to address the data usability requirement as part of the Quality Assurance program for Fort Holabird DIS. Data Quality Objectives (DQOs) have been developed to ensure data collected during field investigation/RA process will be of known defensible quality suitable for achieving project objectives.

6.2 DATA INTEGRATION AND MANAGEMENT

This section summarizes unresolved issues pertaining to the validity of using historical data sets in the installation environmental restoration program. Future action items may focus on continuing to ensure the acceptability of data generated through: 1) compliance with USEPA guidance on data validation; and 2) execution of field work in accordance with procedures established in approved Sampling and Analysis Plans (SAP).

6.2.1 BCT Action Items

The BCT will continue to ensure all parties involved in environmental restoration activities at Fort Holabird DIS are able to share data for decision making.

6.2.2 Rationale

Historical analytical data can contribute to the completion of site characterizations and risk assessments by filling data gaps. Current and future data from each data collection system (e.g., field laboratories, field screening techniques) are critical to the completion of all site characterization efforts, comprehensive conceptual model development, risk assessments, and ultimately the selection of RAs to protect human health and the environment.

6.2.3 Status/Strategy

Data gathered for environmental restoration efforts at Fort Holabird DIS are stored in database format.

6.3 DATA GAPS

This section summarizes unresolved issues pertaining to the determination and collection of data needed to complete the Fort Holabird DIS environmental restoration program.

6.3.1 BCT Action Items

Future action items may include the assessment of data gaps for the ongoing development of an environmental restoration strategy.

6.3.2 Rationale

Effective identification and filling of data gaps will permit the development of comprehensive conceptual site models for site characterization and risk assessment. Effective analysis of data gaps will also facilitate the completion of investigation efforts so that appropriate RAs can be identified and evaluated. This information will also facilitate the identification of clean areas at Fort Holabird DIS.

6.3.3 Status/Strategy

Because there are no BCT action items for data gap issues, there is no strategy. Future strategy may incorporate the use of BCT meetings to resolve data gap issues prior to the execution of additional field work.

6.4 BACKGROUND LEVELS

This section summarizes unresolved issues pertaining to documenting background levels for the Fort Holabird DIS environmental restoration program.

6.4.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may focus on establishing background concentrations of elements in the environment at Fort Holabird DIS for use in baseline risk assessment computations.

6.4.2 Rationale

Background concentration values of analytes in the soil, groundwater, surface water, and sediment need to be determined before risk assessments can be conducted. The values must be representative of analyte concentrations which are naturally occurring and analyte concentrations which are due to anthropogenic sources. The EPA and MDE regulators must concur with these values.

6.4.3 Status/Strategy

Because there are no BCT action items for background level issues, there is no strategy.

6.5 RISK ASSESSMENT

This section summarizes unresolved issues pertaining to the completion of risk assessments required to complete the Fort Holabird DIS environmental restoration and compliance programs.

6.5.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include continuing to evaluate the role of anticipated land use as a criterion in selection assumptions in the exposure assessment.

6.5.2 Rationale

Anticipated or known land uses at Fort Holabird DIS need to be considered in exposure assessment assumptions.

6.5.3 Status/Strategy

Because there are no BCT action items that apply to risk assessment procedures at Fort Holabird DIS, there is no strategy. Future strategy may incorporate the development of risk assessment protocols.

6.6 INSTALLATION-WIDE REMEDIAL ACTION STRATEGY

This section summarizes unresolved issues pertaining to an installation-wide remedial action strategy. A remedial action strategy has not been developed for Fort Holabird DIS to address the ongoing environmental restorations. Once developed, the future land use risk assessment for remedy selections will be presented in Table 6-1.

6.6.1 BCT Action Items

No BCT Action items have been identified at Fort Holabird DIS at this time. Future action items may include the development of an installation-wide remedial action strategy.

6.6.2 Rationale

The installation-wide remedial action strategy should be structured to achieve expedited remedial actions while controlling costs.

6.6.3 Status/Strategy

Because there are no BCT action items for installation-wide remedial action issues, there is no strategy.

6.7 INTERIM MONITORING OF GROUNDWATER AND SURFACE WATER

This section summarizes unresolved issues pertaining to monitoring groundwater and surface water.

6.7.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.7.2 Rationale

Long term groundwater monitoring may be necessary as part of remedial efforts at Fort Holabird DIS.

6.7.3 Status/Strategy

Because there are no BCT action items for interim monitoring, there is no strategy.

6.8 EXCAVATION OF CONTAMINATED MATERIALS

This section summarizes unresolved issues pertaining to the excavation of contaminated materials. At this time, excavation of contaminated material has not been planned at Fort Holabird DIS.

6.8.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.8.2 Rationale

Excavation of contaminated materials may be required as part of the environmental restoration efforts at Fort Holabird DIS.

6.8.3 Status/Strategy

Because there are no BCT action items for excavation issues, there is no strategy.

Table 6-1. Future Land Use Risk Assessment for Development of Remedy Selections

Site	Risks	Contaminants of Concern			Current Use	Adjacent Use	Anticipated Use
		Groundwater	Soil	Surface Water/ Sediment			
Former UST Area	Exposure to petroleum products	Free phase product	Petroleum contamination	None	Property is not being used.	Industrial and Administrative.	Industrial or Administrative.

Source (USACE, 1997a,c)

6.9 PROTOCOLS FOR REMEDIAL DESIGN REVIEWS

This section summarizes unresolved issues pertaining to the development of protocols for the review of remedial designs. At this time, protocols have not been developed.

6.9.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the development of protocols for the review of remedial designs.

6.9.2 Rationale

Review of remedial designs is critical to insure that they will achieve cleanup goals and that they are technically and administratively feasible.

6.9.3 Status/Strategy

Because there are no BCT action items for developing protocols for remedial design reviews, there is no strategy.

6.10 CONCEPTUAL MODELS

This section summarizes unresolved issues pertaining to the development of conceptual models for environmental restoration efforts at Fort Holabird DIS. At this time, conceptual site models have not been prepared.

6.10.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the development of conceptual models.

6.10.2 Rationale

The conceptual site models will be developed based on the results of past investigations and ongoing remedial actions.

6.10.3 Status/Strategy

Because there are no BCT action items for conceptual models, there is no strategy.

6.11 CLEANUP STANDARDS

This section summarizes unresolved issues pertaining to the development of cleanup standards. Cleanup standards will be used to identify remedial alternatives capable of achieving cleanup goals and determine the time at which remediation will be complete. Once Fort Holabird DIS is fully characterized, human health standards for potential contaminants of concern will be listed in Table 6-2. Additional standards will be presented in subsequent tables as necessary. The EA report determined that there are no surface or subsurface soil cleanup requirements at Fort Holabird DIS. Only groundwater remains a potentially contaminated media.

Table 6-2. Human Health Standards

Contaminant	Concentration Level
Contaminants of potential concern and, therefore, cleanup standards, have not been established for Fort Holabird DIS at this time. Future changes will be reflected here.	

6.11.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include confirming the cleanup goals with USEPA and MDE which will be used to remediate sites at Fort Holabird DIS.

6.11.2 Rationale

Cleanup standards may be based on ARARs or they may be based on estimates of risk. The ARARs will be identified and risk will be estimated for contaminants of concern. The cleanup standards will be selected after review and evaluation of ARARs, risk assessment, and review of potential land reuse.

6.11.3 Status/Strategy

Because there are no BCT action items for cleanup standards, there is no strategy.

6.12 INITIATIVES FOR ACCELERATING CLEANUP

This section summarizes unresolved issues pertaining to the development of initiatives for accelerating cleanup at contaminated sites. At this time, cleanup acceleration initiatives have not been formulated. During 1992 and 1993, the U.S. Army developed an acceleration plan that was reviewed and concurred with, by the regulatory agencies. Key points of the plan included:

- Overlap of RCRA Facility Investigation (RFI)/Corrective Measures Study (CMS) and Remedial Design (RD)/RA phases;
- Acceleration of procurement actions;
- Concurrent U.S. Army/regulatory review of all work plans, RFI/CMS reports, and secondary documents;
- Compression of time allocated to produce revised documents and comment response packages;
- Compression of field schedules;
- Supplementing existing work plans for future work instead of producing new work plans (includes Quality Assurance Project Plans and Health and Safety Plans);
- Initiating field work after review and resolution of comments on draft work plans; and
- Using RFI data packages as the decision point for NFRAP, RAs, or continued study.

Fort Holabird DIS will incorporate these key points whenever possible in their restoration program.

6.12.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.12.2 Rationale

It is desirable to initiate accelerated cleanups at Fort Holabird DIS to facilitate the property transfer process.

6.12.3 Status/Strategy

Because there are no BCT action items for accelerating cleanups, there is no strategy. Initiatives for accelerating cleanup that can be implemented by the BCT include the following:

- Evaluate the use of OUs that reflect current environmental restoration investigations to expedite the investigation and review process;
- Target Source Areas - Target source areas for early RAs;

- Identify ARARs - Early in the project, develop a list of ARARs by obtaining lists of ARARs from the State and other agencies and examine the RODs for similar sites in the same state to identify which ARARs are likely to apply;
- Risk-based Cleanup - Pursue negotiations with the regulators to agree on risk-based cleanup standards based on future land usage;
- Agreements - The use of Interagency Agreement, FFAs, and DoD/Maryland Memorandum of Agreement to implement agreements and expedite cleanup, needs to be explored;
- Defined Document Review Process - Negotiate terms with the regulatory reviewers to streamline the review process by agreeing to a definitive time cycle (such as 12 months) from the submittal of a draft FS/PP to the signing of a ROD;
- Concurrent Reviews - Develop a complete list of reviewers early and pursue parallel review tracks to eliminate delays;
- Team Approach - Build a strong team, consisting of the BEC, USAEC and USACE representatives, contractors, and Federal and Maryland regulatory personnel, that has the authority, responsibility, and accountability for implementing innovative solutions to remediate and close sites in a timely, cost-effective manner;
- Joint Preparation - Expedite the document preparation and review/approval by forming a working team with USEPA and MDE when preparing required documents such as DDs and RODs;
- Community Involvement - Involve the community during the remedial process to encourage support at the time of site closure. By informing the community during the process, the likelihood of opposing comments during the public comment period will be lessened;
- Concurrent PP and ROD/DD - Prepare the PP and the draft ROD or DD concurrently to facilitate simultaneous review by DoD, USEPA, and/or MDE. Remain flexible as comments to the PP may result in changes to the ROD/DD;
- Innovative Technologies - Pursue collaborative projects using innovative technologies being researched at the USAEC or USACE, or those suggested by the contractor;
- Generic Procedures - Develop generic procedures and Scopes of Work for common problems or common types of contaminated sites (such as fuel contamination in soil). These procedures should be flexible enough for site-specific modifications to be made;
- Innovative Contracting - Maximize flexibility of contracting procedures, investigate the use of level-of-effort, direct/cost reimbursement, award incentives, and other flexible contracting methods; and
- Personnel and Resource - Determine personnel expertise and funding required to handle existing and proposed environmental restoration/compliance programs, including support to the Technical Review Committee (TRC) and the CRP.

6.13 REMEDIAL ACTIONS

This section summarizes unresolved issues pertaining to the execution and completion of remedial actions.

6.13.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.13.2 Rationale

Technical issues must be addressed in a timely manner to insure that the RA schedules are not adversely affected. It is desirable that RAs required at Fort Holabird DIS be completed at closure.

6.13.3 Status/Strategy

Because there are no BCT action items for RAs, there is no strategy.

6.14 REVIEW OF AND APPLICATION OF SELECTED TECHNOLOGIES FOR EXPEDITED SOLUTIONS

This section summarizes unresolved issues pertaining to the review and application of selected technologies to expedite remedial solutions.

6.14.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the review of selected technologies for expedited remedial actions on an as-needed basis.

6.14.2 Rationale

It is desirable to expedite evaluation of remedial technologies at Fort Holabird DIS in order to facilitate the property transfer process.

6.14.3 Status/Strategy

Because there are no BCT action items for review of technologies, there is no strategy.

6.15 HOT SPOT REMOVALS

This section summarizes unresolved issues pertaining to the removal of hot spots. As defined in the DoD guidance, this review item involves implementation of rapid removal of "hot spots" while investigation continues.

6.15.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the review of identified hot spots to determine if removal of the hot spots will expedite cleanup and property transfer efforts. If these efforts will be expedited by a hot spot removal, the BCT may elect to incorporate this approach into the remedial action strategy for the installation.

6.15.2 Rationale

Hot spot removals may expedite any required cleanup efforts and facilitate property transfer. If appropriate, hot spot removals may be used to achieve these goals.

6.15.3 Status/Strategy

Because there are no BCT action items for hot spot removals, there is no strategy. Should information arise which would suggest the need for immediate action in order to protect human health and the environment, the BCT may elect to make decisions regarding the best strategy for removal with USACE and MDE.

6.16 IDENTIFICATION OF CLEAN PROPERTIES

This section summarizes unresolved issues pertaining to identification of clean properties at Fort Holabird DIS. The primary method for identification of clean parcels is the CERFA Letter Report. This report is currently under review. The final determination of the first group of clean parcels will be dependent upon USEPA concurrence with the CERFA parcels identified in the report.

6.16.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. As areas at Fort Holabird DIS are remediated, the BCP will be updated to reflect the changes.

6.16.2 Rationale

It is necessary to identify clean properties as part of the property transfer effort.

6.16.3 Status/Strategy

Because there are no BCT action items for the identification of clean properties, there is no strategy. The BCT may use the CERFA Letter Report as the initial identifier of clean parcels.

6.17 OVERLAPPING PHASES OF THE CLEANUP PROCESS

This section summarizes unresolved issues pertaining to potential overlap of cleanup process phases.

6.17.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include BCT review of the remedial design to evaluate existing opportunities for combining remedial actions in order to eliminate duplication of effort.

6.17.2 Rationale

Overlapping remedial actions can eliminate duplicate efforts and facilitate property transfers.

6.17.3 Status/Strategy

Because there are no BCT action items for overlapping phases of cleanup efforts, there is no strategy.

6.18 IMPROVED CONTRACTING PROCEDURES

This section summarizes unresolved issues pertaining to improved contracting procedures. Efficient and cost effective contracting procedures are necessary to expedite the restoration process.

6.18.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.18.2 Rationale

Timelines in the contracting process are important for expeditiously completing restoration activities.

6.18.3 Status/Strategy

Because there are no BCT action items for improving contracting procedures, there is no strategy. Any unresolved technical issues relative to improving contracting procedures will be addressed in future revisions to this BCP as needed.

6.19 INTERFACING WITH THE COMMUNITY REUSE PLAN

This section summarizes unresolved issues pertaining to the community reuse plan. Interface with the community reuse plan is desirable to expedite the implementation of remedial actions. The LRA, which was designated by the Mayor of Baltimore City in 1995, has recommended a reuse plan for Fort Holabird DIS (BDC, 1997). The Army will continue to interface with the LRA until the reuse plan is finalized.

6.19.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.19.2 Rationale

Coordination with the community reuse plan contributes to the selection of appropriate cleanup standards and facilitates implementation of remedial alternatives, ultimately resulting in the successful transfer of property.

6.19.3 Status/Strategy

Because there are no BCT action items for interfacing with the community reuse plan, there is no strategy. In the future, the BCT may work to ensure that reuse activities will be compatible with restoration activities.

6.20 BIAS FOR CLEANUP INSTEAD OF STUDIES

This section summarizes unresolved issues pertaining to emphasizing cleanup instead of conducting additional studies. Whenever possible, the BCT may select early cleanup rather than conduct additional studies of potentially contaminated sites. This approach will expedite early achievement of cleanup goals and transfer of property.

6.20.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the BCT, making every effort to implement any necessary remedial technologies as soon as possible to facilitate the transfer of Fort Holabird DIS.

6.20.2 Rationale

Early implementation of remedial alternatives will reduce the need for additional studies of contaminated sites and will accelerate completion of cleanup activities. This acceleration in turn will facilitate property transfer efforts.

6.20.3 Status/Strategy

Because there are no BCT action items for cleanup actions, there is no strategy. In the future, the BCT may elect to promote cleanup instead of studies.

6.21 EXPERT INPUT ON CONTAMINATION AND POTENTIAL REMEDIAL ACTIONS

This section summarizes unresolved issues pertaining to expert input on contamination and potential remedial actions. It is necessary that proper resources are used to evaluate contamination and associated RAs.

6.21.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the BCT utilizing MDE, USEPA, USAEC, and contractors to ensure that the proper resources are used to evaluate contamination and potential remedial actions.

6.21.2 Rationale

The use of several entities involved in the restoration at Fort Holabird DIS promotes an expedited property transfer process.

6.21.3 Status/Strategy

Because there are no BCT action items for expert input, there is no strategy.

6.22 PRESUMPTIVE REMEDIES

This section summarizes unresolved issues pertaining to presumptive remedies. The USEPA has issued guidance on presumptive remedies for a few specific contamination scenarios, e.g., one of the

presumptive remedies for vadose zone volatile organic compound contamination is soil vapor extraction. Some of these presumptive remedies may be applicable to Fort Holabird DIS if contamination scenarios are similar to those in the presumptive remedy guidance.

6.22.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the BCT considering presumptive remedies to expedite implementation of the installation's RA strategy.

6.22.2 Rationale

The use of presumptive remedies may potentially hasten the cleanup process by allowing for expedited implementation of cleanup technologies.

6.22.3 Status/Strategy

Because there are no BCT action items for presumptive remedies, there is no strategy.

6.23 PARTNERING (USING INNOVATIVE MANAGEMENT, COORDINATION, AND COMMUNICATING TECHNIQUES)

This section summarizes unresolved issues pertaining to partnering. Partnering is the process of fostering cooperation and communication between key players in the BRAC process.

6.23.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items may include the BCT actively fostering partnerships with USAEC, the community, and regulatory agencies through scheduled meetings and the document review process.

6.23.2 Rationale

Close cooperation and coordination between Fort Holabird DIS, USAEC, the community, and regulators helps foster good working relationships and can accelerate implementation of the installation's RA strategy by keeping key players informed of the status of environmental efforts, soliciting their input, and addressing potential concerns in the remediation process.

6.23.3 Status/Strategy

Because there are no BCT action items for partnering, there is no strategy.

6.24 UPDATING THE EBS AND NATURAL/CULTURAL RESOURCES DOCUMENTATION

This section summarizes unresolved issues pertaining to updating the Fort Holabird DIS EBS and natural and cultural resources documentation. The CERFA Letter Report, including parcel classifications has been updated for use in this document based on the results of ongoing activities at Fort Holabird DIS.

6.24.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future action items include updating the CERFA Letter Report as necessary.

6.24.2 Rationale

Updates of the CERFA Letter Report are necessary to reflect changes in parcel classification based on completion of RAs. The most recent parcel reclassification has resulted in all of Fort Holabird DIS becoming eligible for property transfer.

6.24.3 Status/Strategy

Because there are no BCT action items for updating environmental documentation, there is no strategy.

6.25 IMPLEMENTING THE POLICY FOR ON-SITE DECISION MAKING

This section summarizes unresolved issues pertaining to implementing policy for on-site decision making. If decisions leading to investigation, remediation, and transfer of Fort Holabird DIS can be made on site, implementation of the installation-wide RA strategy will be expedited.

6.25.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time. Future changes will be reflected here.

6.25.2 Rationale

Close cooperation and coordination between Fort Holabird DIS, USAEC, the community, and regulators helps foster good working relationships and can accelerate implementation of the installation's RA strategy by keeping key players informed of the status of environmental efforts, soliciting their input, and addressing potential concerns in the remediation process.

6.25.3 Status/Strategy

Because there are no BCT action items for on-site decision making, there is no strategy.

6.26 STRUCTURAL AND INFRASTRUCTURE CONSTRAINTS TO REUSE

This section summarizes unresolved issues pertaining to structural and infrastructure constraints to reuse.

6.26.1 BCT Action Items

No BCT action items have been identified at Fort Holabird DIS at this time.

6.26.2 Rationale

Potential structural and infrastructure constraints must be overcome or alternative reuses must be identified, to allow transfer of the Fort Holabird DIS property.

6.26.3 Status/Strategy

Because there are no BCT action items for structural or infrastructure constraints, there is no strategy.

6.27 OTHER TECHNICAL REUSE ISSUES TO BE RESOLVED

At the present time, no other technical reuse issues have been identified.



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APPENDIX A
FISCAL YEAR FUNDING REQUIREMENTS/COSTS

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Table A-1. Projected Restoration Program Cost Requirements

Program	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	Total
Information is not available at this time.						

Table A-2. Projected Compliance Program Cost Requirements

Program	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	Total
There are no anticipated compliance program costs for Fort Holabird DIS.						

Table A-3. Projected Natural and Cultural Resources Program Cost Requirements

Program	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	Total
There are no anticipated Natural and Cultural Resources Program costs for Fort Holabird DIS.						

Table A-4. Projected Total Environmental Program Cost Requirements

Program	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	Total
Total Environmental Program Costs	\$95,000					\$95,000

Table A-5. Historical Expenditure by Site

Program	FY 1997	FY 1998	FY 1999	FY 2000	FY 2001	Total
Information is not available at this time.						



This past restoration schedule is unavailable at this time.

Figure A-1. Past Restoration Schedule



APPENDIX B
INSTALLATION ENVIRONMENTAL RESTORATION DOCUMENTS SUMMARY TABLES

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Table B-1. Project Deliverables

Year	Project Title	Report No.	Sites Examined	Deliverable Date/By Whom
1986	Tank Closure Documents	1	Former UST spill area	1986/ MDE
1990	Installation Assessment Army Base Closure Program, Fort Holabird, Baltimore, MD.	2	Installation-wide	1990/ Environmental Photographic Interpretation Center (EPIC)
1990	Internal Environmental Assessment including LBP and Radon Testing	3	Building 320	1990/ Fort Holabird DIS
1991	PCB-contaminated Materials Testing	4	Building 320	1991/ MET Electronic Testing Company, Inc.
1994	Soil Disposal Documents	5	AST spill area	1994/ Cherokee Environmental Group
1995	PA Screenings for Fort Holabird DIS.	6	Building 320	1995/ Fort Meade EMO
1996	Environmental Baseline Survey, Draft and Draft Final Document	7	DIS	1996/ ICF Kaiser Engineers
1996	Sampling and Analysis Plan, Draft and Draft Final Document	8	DIS	1996/ ICF Kaiser Engineers
1996	BRAC Cleanup Plan, Version I, Draft Document	9	DIS	1996/ ICF Kaiser Engineers
1997	Project Work Plan, Environmental Sampling Activities	10	DIS	1997/ USACE, Baltimore District
1997	Environmental Assessment for Disposal/Reuse	11	DIS and Cummins Apartments	1997/ USACE, Baltimore District
1997	Environmental Sampling Draft Data Summary Report	12	DIS	1997/ USACE, Baltimore District
1997	Reuse Plan for U.S. Department of the Army Fort Holabird's CRC and DIS	13	DIS and CRC	1997/ Baltimore Development Corporation
1998	Environmental Baseline Survey, Final Document	14	DIS	1998/ ICF Kaiser Engineers
1998	BRAC Cleanup Plan, Version I, Final Document	15	DIS	1998/ ICF Kaiser Engineers
1998	BRAC Cleanup Plan, Version II, Draft and Final Document	16	DIS	1998/ ICF Kaiser Engineers

CRC Crime Records Center
 DIS Defense Investigative Services
 EMO Environmental Management Office
 ERM Environmental Resources Management
 MD Maryland
 MDE Maryland Department of the Environment
 PA Preliminary Assessment
 PUCA Property Underlying Cummins Apartments
 USACE United States Army Corps of Engineers

Table B-2. Site Deliverables by Phase *

Site	EA	EBS	SI	FS	DD	EE/CA	LTM	NFRAP	Close-out
Building 320	2,3,4,6	7,11	10,12						
AST Storage Area	5,8	7,11	10,12						
Former UST Storage Area	1,5,8	7,11	10,12						
PCB Contamination Area	4,5	7,11	10,12						
Former Mound/ Excavation Trench Area	2,8	7,11	10,12						

EA – Environmental Assessment
EBS – Environmental Baseline Survey
EE/CA – Engineering Evaluation/Cost Analysis
DD – Decision Document
FS – Feasibility Study
LTM – Long Term Monitoring
NFRAP – No Further Remedial Action Planned
SI – Site Investigation

Table B-3. Technical Documents/Data Loading Status Summary

Date	IRP Title	Site/OU	Contractor	Service Center	IRDMIS Status/Other
There are no plans at this time to load the Fort Holabird DIS data into IRDMIS.					

IRDMIS – Installation Restoration Data Management Information System
IRP – Installation Restoration Program
OU – Operable Unit

* The numbers in the body of this table correspond to the deliverables listed in Table B-1.



APPENDIX C
DECISION DOCUMENT/ROD SUMMARIES

Decision Documents/ROD summaries have not yet been prepared for Fort Holabird DIS.

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APPENDIX D
NFRAP SUMMARIES

Appendix D is not applicable to Fort Holabird DIS at this time.

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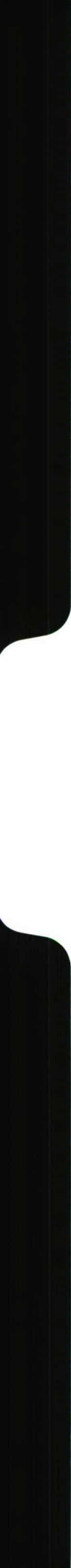




APPENDIX E
CONCEPTUAL MODEL DATA SUMMARIES

There are no conceptual model data summaries for Fort Holabird DIS at this time.

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APPENDIX F
ANCILLARY BCP MATERIALS

There are no ancillary BCP materials at this time.

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